ZAP

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Introduction

ZAP is a free-access social networking website ("community platform") in Luxembourg for people aged 12 and above. Due to the three main languages that are spoken in the country, *ZAP* offers Luxembourgish, German, and French versions of the site. It provides information on event schedules, nightlife reports, user profiles, homepages, and photos that may be used on mobile devices or web browsers. Users of *ZAP* may present and describe themselves for social purposes using public messages, friend lists, a mailing system, and picture and video upload functions. Although exact numbers are missing, *ZAP* claims to have a penetration of 65% in its target audience in Luxembourg (http://www.zap.lu/lu/p10458/index.html, accessed 10-12-2010). In 2010, the company launched the international version of its services under ZAPOn.com.

The following is a report of findings of the analysis of the self-declaration provided by ZAP and the testing of its website. The test was conducted in December, 2010 – January, 2011.

Summary of main findings

Testing of the ZAP website showed that the *ZAP* provides users with a comprehensive, age-appropriate and easy-to-find safety tips and information for adolescents and their parents. The SNS provider treated a report on bullying timely and adequately; the offensive material in question was deleted and a warning was sent to the initiators of bullying. Other areas, however, are less successfully implemented on the *ZAP* website. For example, simply changing the year of birth was sufficient to outmanoeuvre the age registration barrier. In contrast to the self-declaration, profiles of users under 16 are searchable within *ZAP* and via Google. In addition, the SNS website currently lacks additional educational material for children and carers, although links are provided to organisations concerned with online safety.

In contrast to the self-declaration, default settings for new user profiles render all personal information visible to everyone, rather than keeping the information private by default. Finally, deleting a user account is easy. It is possible to do it via a dedicated web link and users receive a warning that all data will be lost. In sum, testing revealed that not all safety measures mentioned in the self-declaration have been implemented in the *ZAP* website, yet.

Analysis of Results by Principle

Principle 1: Raise awareness of safety education messages and acceptable use policies to users, parents, teachers and carers in a prominent, clear and age-appropriate manner

Main findings in relation to the self-declaration

According to its self-declaration ZAP provides clear guidance for children and young people on how to navigate their website safely, for instance the site includes safety Guidelines for

children and their parents and some specific sections of the Terms of Service have been written keeping both parents and children in mind. ZAP continually reminds its young users to consult the Guidelines (downloadable PDF) so that they can learn to be safe online.

Zap`s Terms of Service is dedicated to adolescents and their parents. They inform users that they have to adhere to Zap`s guidelines and specify what Zap considers as inappropriate behaviour and the consequences thereof. Zap is currently working on a school guide for teachers and school personnel focused on the potential risks associated to the use of SNS use and how to prevent them.

The self-declaration does not specify if any technical controls (e.g. parental filters) are currently offered to parents and/or teachers.

Main findings in relation to the website

In accordance with the self-declaration, the ZAP website provides guidelines on Internet safety, online risks, and information on privacy. In addition, there is explicit information on both content and conduct that is not allowed on the SNS. Likewise, the consequences of engaging in prohibited behaviour and/or actions are clearly stated. Detailed, yet not easy for children to understand, information is found in Terms of use ("Konditiounen"). Surprisingly, and in contrast to Protection of minors, Terms of use are not available in Luxembourgish, but in German and French only, which Luxembourgish minors may not read or understand.

In contrast, Protection of minors ("Jugendschutz") contains clear and targeted information for minors and parents (e.g. "What can I do as a parent to protect my child?" ("Wat këmnen d'Elteren maachen?"). Links to these webpages are located at the very bottom of the website. Once clicked, information is clearly visible. The text-based information itself is presented using plain and succinct language. Additional PDF files containing safety-relevant tips that were mentioned in the self-declaration were not found during testing, though.

For more information on Protection of minors, the website provides users with links to the EC, to youth services (Service national de la jeunesse - snj), and to organisations that are committed to online safety, including the National Commission for Data protection (CASES), Luxembourg Safer Internet (Lusi), and Luxembourg Internet Safety Alert (LISA Stop Line). General information for parents and caregivers is not available separately, but presented as the final paragraph in the Protection of minors section.

Principle 2: Work towards ensuring that services are age-appropriate for the intended audience

Main findings in relation to the self-declaration

In its self-declaration ZAP refers to diverse mechanisms through which the service provider ensures limited exposure to potentially inappropriate content and contact for children, for example by rejecting and hashing inappropriate pictures, by deleting accounts for uploading inappropriate content (e.g. Pornographic, racist, violent content.). Furthermore, ZAP claims it retraces inappropriate content by collecting IP addresses and Buzz words filters, installed to identify inappropriate behaviour or abusive users. The types of services that are considered as not appropriate for children and young people are specified in the Terms of Service (e.g. racist, violent, pornographic content, etc.). The minimum age requirement is 13. However, Zap stresses that no extra steps are taken to ensure that children younger than 12 do not re-register on their site.

In order to guarantee users` privacy, ZAP claims it employs cookies to make sure that advertising is age-related and suitable for minors. Besides, "foreign applications" are not allowed to be embedded on ZAP`s website. Moreover, user profiles can be evaluated by other users. Profiles of users who get systematic bad evaluations are checked up promptly.

The self-declaration does not refer to how this service provider promotes the uptake of parental controls to allow parents to manage their children's safe use of the service.

Main findings in relation to the website

As opposed to what is stated in the self-declaration, ZAP Terms of use indicate that people aged 12 (and not 13) and above are allowed to use most, but not all services of *ZAP,* for which additional age restrictions apply (i.e., "Disco", "Café", "DeeJay"). With regard to these age-restricted services, some inconsistencies were observed in the different language versions of the Terms of use. According to the French version, some of *ZAP'*s functions require a minimum age of 16, and others are for people aged 18 and above. According to the German version, however, additional functions always require a minimum age of 18. Testing also revealed another inconsistency in terms of age requirements. In contrast to both the German and the French version of the Terms of use, it was not possible to sign up as a 12-year old child (i.e., by selecting 1998 as year of birth) on *ZAP.* Rather, only users aged 13 and above are allowed to sign up.

Signing up to the SNS website requires ticking a box that indicates that the Terms of use are accepted. Next, the date of birth and other information (e.g., name, nickname, sex) have to be entered. Entering the birth data of a 9-year old child leads to a rejection of the user during registration. However, simply changing the year of birth from 2001 to 1997 (but not to 1998, see above) led to successful signing up, confirming the fact that ZAP does not take any extra steps to ensure that children younger than 12 do not re-register on their site. However, the SNS provider ensures limited exposure to potentially inappropriate material and contact for minors, for example, by removing content or deleting accounts of users that posted inappropriate content.

During testing the "Buzz words filter" functionality was tested. To test for automatic identification of inappropriate behaviour and abusive users, a (fake) female minor was "bullied" by two other (fake) minors who explicitly used offensive Luxembourgish derogatory terms. A bullying picture was also uploaded to a new photo album entitled "dirty X" on the personal page of one of the "bullies" and a comment was posted on the wall of the "bully victim". However, no actions were taken by ZAP, the offensive content was not removed and none of the "bullies" received any warnings indicating that the "Buzz words filter" functionality is ineffective.

In relation to advertising, when signed up as the 15-year old girl, banner advertising was present on the top and on the right side of the minor's personal page. One banner announced the availability of a mobile version of *ZAP*. The second banner automatically switched between an announcement of a so-called "flirt party" (with only date and venue shown) and an e-commerce ad for tires. No other advertisement was present.

Confirming the analysis of the self-declaration, parental control tools are missing on the SNS. However, the Protection of minors document includes a "what parents can do" section.

Principle 3: Empower users through tools and technology

Main findings in relation to the self-declaration

According to its self-declaration several tools and technologies are employed by ZAP to assist children and young people in managing their experience on their service, particularly with regards to inappropriate or unwanted content or conduct, for instance profiles and homepages of users under 16 are not searchable and users under 16 cannot be browsed. By default profiles of users aged 13-16 are "not public", i.e. "they are unsearchable by age on search engines". But this does not necessarily mean that their profiles are "private by default"[1] as defined in the Safer Social Networking Principles[2]. Besides, nothing is mentioned about the default privacy settings of 17-18 year olds.

According to the self-declaration, however, users can manage the access to their profiles, for instance by "opening" their profile to friends, by reject friendship requests or by putting users to the "ignore list". Ignored users cannot post further messages, ratings or comments on the "protected" profile. Users can, thus, restrict access to the different sections on their profile and they can always report inappropriate behaviour on the site.

Main findings in relation to the website

As opposed to what is stated in the self-declaration, testing on the site revealed that registered adults of ZAP can search for personal profiles of 13- and 15-year old minors by using *ZAP*'s searching function. Also, using Google's search function returned the full profile (e.g., age, personal preferences, sexual orientation, private messages, pictures) of the 15-year old minor, but not that of the 13-year old created for this test. However, because the two minors were friends on *ZAP,* postings of the 13-year old on his profile were also displayed on the profile of the 15-year old. Testing revealed that these postings (e.g., a picture) serve as a link and that simply clicking on his postings was sufficient to gain access to the full profile of the younger user. Adults may also add minors to their contact list without restriction. Likewise, minors may accept the adult's invitation and add them to their contact lists without any restrictions, either. During testing, no tool was found to enable the user to restrict the search options of others (e.g., in order to prevent adults from contacting minors). In sum, these observations are in sharp contrast to the self-declaration of the SNS provider.

In line with the self-declaration, testing revealed that the *ZAP* website offers various tools that empower users. These include specifying user groups that may or may not contact the user (i.e., blocking function), as well as specifying actions with regard to the availability or accessibility of individual profiles (i.e., restricting access to certain sections of the personal profile). Users may also delete unwanted comments, prevent posting of public messages on their profile, and report unsuitable behaviour.

Finally, apart from the safety information provided to parents via the Protection of minors section (see Principle 1), parents are not provided with any (parental control) tools to help them protect their children.

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[1] "Ensuring that setting a profile to private means that the full profi le cannot be viewed or the user contacted except by 'friends' on their contact list".

[2] http://ec.europa.eu/information_society/activities/social_networking/docs/sn_principles.pdf

Principle 4: Provide easy-to-use mechanisms to report conduct or content that violates the Terms of Service

Main findings in relation to the self-declaration

In its self-declaration ZAP refers to the available mechanisms to report inappropriate content, contact or behaviour that violates the Terms of Service, namely a Report button on the top of every page and a Report abuse email available from the contact info. No information is provided in the self-declaration regarding if or how the reports are acknowledged or if the reports are acted upon expeditiously. The self-declaration does not mention if users are provided with an indication of how their reports are typically handled, either.

Main findings in relation to the website

Confirming the analysis of the self-declaration, a list of e-mail addresses may be found in the Contact and Support document ("Kontakt und Support"), which is located on the bottom of each page of the *ZAP* website. Inappropriate pictures and behaviour may be reported via different e-mail addresses (e.g. pictures@zap.lu; abuse@zap.lu). In addition, a "Report" button serves as an alternative to report inappropriate conducts or content. The "Report" mechanism is found easily and quickly. Clicking on the "report webpage" button opens a window that provides the user with a text box, in which observations may be entered. In addition, the user is presented with a (non-exhaustive) selection of topics (e.g., violation of Terms of use, pornographic content). In some cases, for instance in the case of bullying, it may be difficult to decide which label to use because no explicit "report person" option is provided.

As part of this study, a (fake) minor user reported that she had been bullied on this SNS. A realistic bullying situation was set up between the (fictitious) owners of profiles that were created for this assessment. The scenario consisted of one minor being bullied by two other minor users who posted a nasty comment on the wall of the "victim" and who uploaded and/or sent hurtful pictures. As the "victim" could not cope with the nasty comment put on her profile and the embarrassing pictures, she contacted the provider. Given the aforementioned fact that the "Report" button on the *ZAP* website has no explicit "report person" option, it was decided to contact the provider via "abuse@zap.lu". However, the e-mail returned twice with a "message delivery failure". Finally, the message was sent using the e-mail address "contact@zap.lu". This time, the report message was acted upon expeditiously (approx. 22 minutes). Using a succinct language, the e-mail explained that the offensive pictures had been removed and that both users who had sent the bullying messages had been sent warnings. Indeed, this was the case. In sum, the test demonstrates that reporting mechanisms are not very user-friendly and that ZAP replies expeditiously to user reports.

Principle 5: Respond to notifications of illegal content or conduct

Main findings in relation to the self-declaration

The self-declaration indicates that users` uploads are daily checked by ZAP administrators. Content that breaches Zap`s Terms of Service is immediately removed. "Minor infractions may lead to a warning" while repeated ones may lead to being removed from the service. Illegal contents and conducts are always reported to the law enforcement.

Because of ethical reasons, Principle 5 was not tested in the website.

Principle 6: Enable and encourage users to employ a safe approach to personal information and privacy

Main findings in relation to the self-declaration

According to its self-declaration ZAP provides its users with a range of privacy setting options: During registration only the name and the age of minors is shown by default and no other personal information. Users can, then, manage how many details they want to publish about themselves. Furthermore, advice to adapt users' privacy level is provided. In the Guidelines ZAP encourages users not to reveal any private information, such as phone number or address. ZAP users are encouraged, however, to register using their real names, and their real pictures, to remind them that they are accountable for their actions. This also allows ZAP to more easily identify potential abusers.

The self-declaration does not mention if the privacy settings options are prominent and accessible at all times or if users are allowed to view their privacy status or settings *at any given time.*

Main findings in relation to the website

In accordance with the self-declaration, testing revealed that changing privacy settings is always possible by clicking on the button "account configuration" ("säit administréiren"), which is visible at any time. Changing settings is easy, even for minors. Also, third-party applications will be installed only after previous permission of the user. For the initial step of the first-time registration process, entering e-mail address and individual password is sufficient. Next, a so-called "profile configuration" window appears, which also includes checkboxes on adult-relevant information like, for example, user's sexual orientation and marital status (although both may be set to "secret"), name of the partner, and main interests of using the SNS. Having to provide this information is surprising, because the self-declaration indicated that users are encouraged not to reveal any private information. Following registration, real name or nickname is automatically inserted into the user profile, depending on the user's previous decision, together with information on age, gender, and user's hometown. E-mail is not visible, though. Sexual orientation and marital status (if not set to "secret") as well as main interests are also displayed on the profile page.

Default settings render minor's personal information visible to all other users ("Jiddereen"). Restricting the visibility therefore depends on the account owner's additional activity. This is in contrast to the self-declaration of the SNS that only the name and the age would be shown by default. Also, this is not in line with the information presented in the Protection of minors, which encourages the user not to reveal private information or photos. Apart from this general information on online privacy, there is no additional information on the personal profile that would remind users not to reveal private information.

Finally, deleting a user account is easy. It is possible to do it via a dedicated web link and users receive a warning that all data will be lost.

Principle 7: Assess the means for reviewing illegal or prohibited content/conduct

Main findings in relation to the self-declaration

ZAP`s self declaration indicates that all uploads on their website are daily checked by ZAP administrators and that content that breaches Zap`s Terms of Service is immediately removed from the site. In the background, the frequency with which adults contact minors is counted. "Great age differences between corresponding users as well as suspicious behaviour are leading to an investigation of the profiles in question". It is not explicitly mentioned, though, how the mechanisms to determine the most appropriate procedures for reviewing reports of illegal or inappropriate content or conduct are assessed.

Principle 7 was not tested in the website.

Summary of Results and Conclusions

Principles 1, 2, 4 and 6 are rather satisfactorily implemented and Principle 3 is unsatisfactorily implemented on ZAP`s website. The testing on the website revealed some problematic areas, for instance:

- Profiles of minors are not set to "private by default" as defined by the Safer Social Networking Principles. As a matter of fact, both registered and non-registered users can have access to the profile data of minor users either via the internal ZAP search engine or via external ones.
- Lack of effective age control systems to register on the site.
- Reports are handled very expeditiously, but they are not particularly user-friendly.
- The "Buzz words filter" functionality is ineffective.
- Lack of additional educational material for parents and caregivers in the Luxembourgish version of the Terms of use.
- Lack of consistency in the different language versions of the Terms of use.

Assessment of all the Principles in the Self-declaration

Principle	*Very satisfactory*	*Rather Satisfactory*	*Unsatisfactory*
1	x		
2		x	
3		x	
4		x	
5	x		
6		x	
7		x	

Implementation of the Self-declaration on the SNS

Principle	*Very satisfactory*	*Rather satisfactory*	*Unsatisfactory*
1		x	
2		x	
3			x
4		x	
6		x	

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