

# IMPLEMENTATION OF THE SAFER SOCIAL NETWORKING PRINCIPLES FOR THE EU HABBO HOTEL

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## Introduction

*Habbo Hotel* is a virtual world which provides a platform for social networking, gaming and community development for young people, with a general focus on users aged 13-18. In general, users below this age are not permitted to register on the service, except in a few countries like, for instance, Finland where the minimum age requirement is 10. Habbo was launched in 2000. It has customers in 150 countries. (e.g., UK, Belgium, Italy), and it is available in 11 languages (e.g., English, Portuguese, German, French). As of March 2011, the service had 210,000,000 registered users and over 11,000,000 unique visitors per month<sup>1</sup>. On the site users create a unique avatar, associated profile and their own personalised room. According to Sulake, there are currently over 120 million user-generated rooms in the different Habbo communities<sup>2</sup>. These and official rooms (virtual hotel's rooms, cafés, clubs, the pool area, etc.) are the focus of online interactions and community development. The profile pages can be customised with a guestbook, sticky notes and other widgets. Messages can also be sent between users by Minimail, through chat in different rooms, and by leaving stickies in chat rooms. Users can purchase credits for the virtual world which enable customization of avatars and purchase of other virtual products (e.g., furniture, clothes, pets). *Entering the site is free, but to access services users need to buy the virtual currency, Habbo Credits. Credits are used to pay for virtual furniture and homepage gadgets. Users can play games, train pets, connect with friends, decorate their own rooms and Habbo homepages on the site and they can swap virtual merchandise with other users.*

The following is a report of the analysis of the self-declaration provided by Habbo Hotel and the testing of its website carried out in the period April-May, 2011. Habbo was tested in both the Finnish and the English (UK) versions of the site.

## Summary of main findings

Habbo hotel has generally been successful in implementing the safety measures committed to in their self-declaration. In several sections of the site, the service provides accessible safety information for children and young people which is age appropriate as well as associated information for parents and carers (e.g. parents are encouraged to discuss safe internet use with their children). Although, the Terms of Service provided are framed in complex technical and legal language, the Habbo Way pages provide this information in more age appropriate language, including the types of behaviours which violate these terms and potential consequences.

The minimum age requirement of this SNS is 13 years old. In the Finnish version of the site parents of under 15-year-old users are informed of the child's registration to the site. There is no equivalent action in place for users under 15 in the English version. Inappropriate content was effectively restricted from the site. It was forbidden to enquire or give private information whilst using the virtual world. Users were not able to upload pictures, videos or their personal information on the site and the site also provides several filters to prevent certain types of disclosure and inappropriate content. In spite of the limited amount and type of personal information which users can post and share, tests demonstrated that widgets such as the guestbook, stickies and Minimail can be used to disclose such data. Besides, even though the use of filtering and monitoring tools in the service work effectively, there are ways to circumvent these mechanisms (e.g., by describing phone numbers in words).

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<sup>1</sup> Source: <http://sulake.com/habbo/?navi=2>; accessed 06.05.11

<sup>2</sup> [http://www.sulake.com/press/releases/2011-01-20-Habbo\\_Hotel\\_Hits\\_200\\_Million\\_Registrations\\_.html](http://www.sulake.com/press/releases/2011-01-20-Habbo_Hotel_Hits_200_Million_Registrations_.html)

The SNS provides a variety of reporting mechanisms reflecting the different applications available, and these are prominent, accessible and easy to use. The user reports in both language versions of the site were acted on quickly. The service provides a number of privacy settings (e.g. removing, muting or blocking characters, restricting other users from seeing their profile page, rejecting friendship requests, etc.) which are also accessible and easy to use. However, they lack complexity and do not enable a distinction between general users and friends. Users are also unable to delete their account, and the suggested alternative may be seen as difficult or overly time consuming by young people.

## **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***

The service provider states that they offer *clear* guidance for children and young people on how to navigate their website safely. This is mainly done via the “house rules” (the Habbo way) which, according to the provider, deliver clear instructions for young children on what constitutes good and safe behaviour inside the community. The provider also states that the website provides safety tips and regular e-safety campaigns on the site and also externally via the Habbo infobus.

Habbo specifies in its self-declaration what constitutes inappropriate behaviour and the consequences thereof, for example, engaging in inappropriate discussions (e.g. of a sexual nature); exchanging personal information such as phone numbers; using certain forbidden words or terms, etc. Players who engage in inappropriate interactions can be muted. Other more explicit types of inappropriate behaviours and their consequences are detailed in the link to the “Habbo Way” provided in the self-declaration. These include: bullying is forbidden, or users who break the rules can be banned from the site. The self-declaration provides a link to the “Habbo Way” where information on the consequences of inappropriate behaviour is found. According to the provider, this information is easy-to-understand for young children and teenagers.

The signatory claims that all Habbo communities have local parental safety guidelines. A link to such guidelines containing a few general tips on how to monitor young children’s behaviour online is provided in the self-declaration. The self-declaration does not mention if Habbo hotel offers parents and/or teachers any technical controls on their website.

#### ***Main findings in relation to the website***

The SNS provides clear and targeted Internet safety information for young people and parents. This information addresses general issues of online safety and safe use of the service and can be found in several sections of the site, namely on the “house rules”, Frequently Asked Questions (FAQ) and Support. In the English version of the site, there are also links to other sources of information and support (e.g., charities, helplines, etc.). The safety information for young people and parents can be accessed in a number of different ways. There are direct links from the homepage of the service to information for both audiences which allow those not registered with the service to access related materials. There are a variety of ways in which young people can access information on safe use of the service and reporting problems when signed into the service (e.g., from the profile page, within chat rooms, and via message boards). The information contained in these pages is clear and accessible for the target audiences. In both language versions of the site the SNS provides a separate section for parents which provides specific information on how to use the service safely, as well as some general safety tips. In the English version some links to external agencies were also found. **In none of the versions tested, there is information targeted at schools or teachers, though the information for parents would be equally accessible for these groups.** Some safety guidance was also provided in visual form. In the “house rules” there were pictures of virtual characters who tackled safety risks (e.g. how to reply to someone fishing for passwords). Inside the virtual world there was safety information on the homepage. Users could also use a “virtual robot” to answer questions on safety or other problems related to the use of the site.

The service provides Terms of Use for the general public which can be accessed from the bottom of the homepage (where links to the Privacy Policy, Safety Tips, etc. are also situated). The Terms of Use are not specifically targeted at children and young people, and the text is very technical / legal in places. This is particularly the case with the included descriptions of behaviours which constitute violations (e.g., ‘ethnically or otherwise objectionable comments’). However, the main issues relating to inappropriate use of the service, and associated violations are described in more age-appropriate language within the Habbo Way pages. Although the

service provider included information about what constitutes inappropriate behaviour on the site, for instance aggressive and violent behaviour, taking part in sexual actions and suggestions, and divulging personal information to other users, in the Finnish version of the site, the consequences of inappropriate behaviour are not described. The Terms and conditions only state that Sulake has the right to prevent users from using the service if rules are violated. On the contrary, the English version of the site gives concrete examples of what can happen in response to violations (e.g., moderator alerts, removal from public rooms or being banned).

The main strength of the SNS in relation to Principle 1 is the accessible and age appropriate nature of safety information for young people, particularly the Habbo Way Pages (these can also be accessed through the help menu when in the chat rooms). The main weakness is the technical and legal complexity of the language used to describe the Terms of Service.

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

### ***Main findings in relation to the self-declaration***

Sulake claims that they employ mechanisms to ensure the limited exposure to potentially inappropriate content and contact for children. The provider claims that users can't upload any real photos or videos and sharing personal information such as contact details is forbidden. The self-declaration mentions that these potentially "inappropriate" or forbidden activities are monitored through automated tools such as special filters designed to support the moderation and monitor interaction on the site. Furthermore, Habbo hotel claims it does not host any "adult" content and does not have any specific sections for adults only.

According to the self-declaration, the minimum age requirement in order to subscribe to the website is 13 years old in most countries where the service operates, but it may vary depending on the location. The provider claims that users younger than the minimum age required are denied access. According to the signatory, depending on the country, some additional measures are taken by the provider in order to identify and delete under-age users from their services<sup>3</sup>. For instance, in some countries it is not possible to register from the same computer with a different age, while in other countries an e-mail is sent to parents informing them that their children have created an account on the site. The self-declaration does not mention if Habbo hotel offers parents and/or teachers any technical controls on their website.

### ***Main findings in relation to the website***

In the two language versions tested, the minimum age requirement is different: In the UK version it is 13 years old and in Finland it is 10 years old. This is clearly stated in the Terms of Service, Privacy Policy and information for parents. In the Finnish version of the site, users younger than 15 are obliged to provide their parents' e-mail address before registering so that their parents can be informed about their registration on the site. This e-mail is merely informative and does not ask parents for their permission for their child to use the site. There is no equivalent action in place for users under 15 in the English version. In both language versions tested, users are required to provide their date of birth when signing up, as well as their name, gender and a valid email address. Registration is denied if the provided information indicates that the user is aged below 13. However, as demonstrated by testing, there are no technical or legal mechanisms (at least in the UK and Finland) to prevent the user returning to the registration page and amending their age to be above the minimum required.

There were no functionalities on the site in order to label, rate or age restrict content or chat rooms for minors as there are no specific sections which include adult content. Confirming the analysis of the self-declaration, the site does not provide parental controls, but has its own set of filtering and monitoring tools which are used to block inappropriate content or chat.

The main strength of the SNS in relation to Principle 2 was that inappropriate content was effectively restricted from the site. The main weakness of the SNS in relation to Principle 2 is the lack of technical or other tools to prevent under aged users from amending their date of birth to register with the site.

## ***Principle 3: Empower users through tools and technology***

### ***Main findings in relation to the self-declaration***

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<sup>3</sup> Only if their Terms require a minimum age

The provider claims to have in place a wide range of technical tools to support the community management and moderation particularly with regards to inappropriate or unwanted content or conduct. These include: the automatic saving of the chat log of the discussion; players who are engaged in inappropriate discussions (e.g. of sexual nature) are automatically muted and a filter prevents email addresses and phone numbers from easily being given out).

The self-declaration maintains that Habbo hotel is not a typical “social networking service” and even though, users do have profiles on the site, they are not allowed to share personal information such as contact details or upload pictures or videos to the site. The provider further claims that users can limit access to their profiles by preventing others from sending friends’ requests or being followed inside Habbo. According to the provider, users also have the possibility to ‘mute out’ other players’ chat from their private rooms temporarily or for longer periods.

As previously mentioned, the service provider claims it supports the safety education of parents in order to help them protect children and young people by means of parental guidelines. It is not explicitly mentioned if specific information on safety tools (e.g. filtering software) is given on the website.

### *Main findings in relation to the website*

All users are searchable within the service but this is only successful if the username (not the real name) is known. This information could be determined by seeing another user in a chat room and searching their username, or if they publicly posted their Habbo username somewhere else online. It is also possible to search for Habbo’s at random which could lead to publicly available profile pages, guestbook messages and friend requests. Users cannot be identified via external search engines even if their Habbo username is known. The profile pages of all users are set to public by default. In both language versions tested, profiles of minors can be potentially viewed by all users if their username is known (as described above), and through accessing friends-of-friends on their profile pages. The profile page, however, only contains the username and online status in default setting which limits the amount of personal information they contain. In both versions tested, the friends list is not included by default and must be added to the profile page by the user. Besides, it was forbidden to post personal information on the profile page (e.g. pictures, videos, etc.) and there is also a reminder of this rule on each profile page. Users, however, can share personal information by leaving sticky notes in other users’ rooms (if publicly accessible), and on the Guestbook if it is voluntarily added to the profile page by the account holder). Stickies can also be attached to profile pages, and left in users’ room if they have a noticeboard or sticky pole. Both comments and messages are not pre-moderated, but can be deleted or flagged as inappropriate. In the English version of the site, stickies must be purchased using credits, although credits can also be earned by quests and participating in surveys on the site. In the Finnish version users can post stickies on their own homepage without having to purchase any credits.

Users can be contacted by other people via friend requests, but not by non-users of the service. The service allows users to reject friend requests and choose not to receive friend requests at all; they can also delete accepted friends, and ignore friends and other users in chat rooms. There is no ability to prevent users who are not friends from seeing the profile page unless the user makes it invisible to everyone (including friends) via the privacy settings.

User’s friends can also send them messages using the Minimail application, which also provides the option to delete and report inappropriate messages. There are filtering and monitoring tools which block swearing, email and phone numbers in chat, Minimail, stickies and guestbooks. However, as tests demonstrated, sending phone numbers in words via Minimail, the guestbook or chat was possible<sup>4</sup>. There is also active monitoring of synchronous chatting on the site and a warning to this effect is included when users enter chat rooms. During testing an adult tried to get private information from a minor user in one of the virtual hotel rooms. The adult obtained some information (place of residence, school and address), but phone numbers or e-mail addresses were replaced by asterisks on the screen. When the minor tried to give a phone number for the second time, the moderator issued a warning on the adult’s screen explaining that enquiring or giving phone numbers was forbidden according to the rules of the site. No warning was received when typing in words so phone number could eventually be communicated. During testing, the Finnish version of the site also provided a “nonsense

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<sup>4</sup> According to the provider, blocking numbers written in words would not be a feasible solution because by doing this other (written) content would be unnecessarily blocked as well.

filter” (Höpöfilteri)<sup>5</sup> for users under the age of 13, which translated inappropriate terms to the word “nonsense” (höpö).

The strengths of this SNS in relation to Principle 3 are that the default settings make no personal information available on the profile page and that users were not able to upload pictures or videos on the site. In theory, users were not allowed to upload their personal information on the site, either. However, as tests demonstrated, personal information could be disclosed in chat rooms, on stickies and the guestbook. Even though the use of filtering and monitoring tools in the service work effectively, there are ways to circumvent these mechanisms (e.g., by describing phone numbers in words).

#### *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*

The self-declaration states that Habbo provides “easy ways to report content, suspicious behaviour or other issues taking place in the virtual community”. According to the provider, the Reporting mechanism “Call for Help” button is located in the main toolset inside the world. Via this button users can get quick replies to the most common questions, but they can also report abuse to a moderator. Inappropriate content can also be reported to the moderation staff via the Habbo web (Habbo homepages, guest books, group discussion forums) and the customer support portal contains useful information for players and their parents. The self-declaration does not indicate if user reports are acknowledged or if they are acted upon expeditiously.

##### *Main findings in relation to the website*

The SNS provides a variety of easy-to-use mechanisms to report inappropriate conduct and contact from other users. Their exact operation depends on the specific type of application to which they are related. As stated in the self-declaration, the most prominent reporting mechanism was the Help-button found on every page of the virtual world. Through this link users could report inappropriate behaviour or bullying. The Help-button was age-appropriate, user-friendly and easily accessible. This ‘call for help’ mechanism, available in the user’s own room and other chat rooms, allows users to select another user and ‘ignore’ or ‘report’ them. Selecting ‘report’ links to a list of potential problems (e.g., bullying, scamming) which the user selects. They are then asked to provide a brief description of the problem, and this is sent as a call for help to the moderators for investigation / action. The Help-link was available at all times inside the virtual world.

Inappropriate content / messages in Minimail or the guestbook can be flagged by selecting the red flag icon on each message. These reports are sent to the moderator and the user can remove the person who sent them the message. There is no clear reporting mechanism link from the homepage of the service, though once users have signed in there is a link to report abuse on their profile page and all other pages in the site. There is information in the Habbo Way and Report Abuse pages which provides users with the necessary information to make an effective report. There is also a help option within the rooms which allows access to similar details and a menu-based selection for reporting as described above. The reporting information for users specifies that all reports will be acknowledged and acted on as soon as possible (though no specific timescale is indicated). The process of using each of the different reporting mechanisms is described in the Habbo Way pages and the information accompanying each specific measure. This includes what happens to the report, how it is processed and how users or content reported is subsequently dealt with. For example, when flagging inappropriate content in Minimail, the associated information specifies that reports are sent to the moderator and the user can delete the person who sent them the message. Moderators can impose a variety of bans for users who have been found to have breached the Terms of Use. These also vary in length of time depending on the nature and severity of the

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<sup>5</sup> According to the provider, the “höpö” filter does no longer exist. Nowadays filtered words are replaced by asterisks (##) instead of by the word “höpö”. The provider further claims that this filter is in place in all Habbo communities and that it is “on” by default for all users. Only children over 13 year olds can turn it off.

behaviour. In the English version of the site, these different bans are described in the FAQ pages, and a message explaining the type of ban imposed is sent to users who have been found to have breached the Terms of Use in this way. In the Finnish version of the site the consequences of breaching Terms of Use are not specified. There is only a mention that Sulake can ban the users totally or partially if they break the rules.

During testing, two minors posted nasty comments on a “bullied” minor’s guest list and on one of the “bullies” home page and guest list. In the Finnish version of the site, the bullied minor reported this problem to the moderators via the “Help” button. The report was acknowledged immediately and acted upon expeditiously. Indeed, the minor received a swift response to the query within one minute of leaving the report. The reported contents were not automatically removed. However, the bullied minor was guided further to flag the inappropriate contents on the “bullies” profile pages, which the bullied minor did. The bullied minor received an automatic response that the issue was being handled and the flagged contents were removed within 24 hours. In the English version of the site, when reporting an inappropriate message (bullying) left on the guestbook of a minor (created for this test), an automatic message was generated indicating that the report would be investigated by the moderators and action taken if necessary. Although there was no further contact with the minor who had made the report, the message was deleted. There was no contact or message to the user who had posted the message about their behaviour through Habbo or their external email.

The main strengths of the SNS in relation to Principle 4 are the variety of different reporting mechanisms for the different applications, their accessibility from within the service, and the speed of response in taking action against reports. The main weakness is that there is no link from the customer support query form to the reporting pages or mechanisms. Users on this form are told that they cannot use this facility to report abuse, but there is no direct link to the relevant sections of the site. This could be problematic for parents who want to report a problem relating to abusive or inappropriate behaviour and cannot log into the SNS.

### *Principle 5: Respond to notifications of illegal content or conduct*

#### *Main findings in relation to the self-declaration*

According to Sulake reports referring to illegal content and conduct are top priority and are handled urgently. Images, text or other content, which is illegal, are removed immediately upon notice and saved for possible police investigations. From the self-declaration it is not clear what happens with other types of inappropriate (but not illegal) content, for instance, bullying comments, pictures, videos, etc.

The service provider claims to have implemented arrangements to share reports of illegal content or conduct with the relevant law enforcement bodies and/or hotlines. Concretely speaking, Sulake claims it works hand-in-hand with local authorities and immediately reports illegal content or conduct to them.

Because of ethical reasons, Principle 5 was not tested on the site.

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

#### *Main findings in relation to the self-declaration*

The self-declaration states that users of this SNS are provided with a range of privacy setting options. For instance, Habbo users can limit access to their profiles, they can also prevent others from sending friends requests or from being followed inside Habbo; they can also choose if their profile and online status are public or not. According to the self-declaration, users are also provided with supporting information to help them make informed decisions about the information they post online especially with regards to the “importance of keeping personal information safe”.

The self-declaration states that even though users do have profile pages (that allow them to present their “virtual identity” and publish other types of content) on the site, “users are anonymous, i.e. they are not allowed to share real-life content (such as images or videos) or personal information”.

#### *Main findings in relation to the website*

The privacy settings are easy to use, and can be accessed by users at any time through the associated page in account settings in the profile pages. There is also a link through to these settings from within the chat rooms. The privacy settings available on this SNS relate to who has access to the profile page (nobody or everybody), friend requests (enabled / not enabled), ability to view online status (nobody or everybody), and the ability for other people to follow users between rooms (nobody or friends). Users can also specify privacy options for managing access to their own rooms (e.g., open to all, ring the bell, password protected). Supporting information is not included on the page containing these settings, but there is a general warning against disclosing personal information online and on the site in the Habbo Way pages, and similar information is included in the Privacy Policy. There is also a sticky on the profile page which reiterates the importance of being careful not to disclose personal information to other users. The privacy settings are very easy to use for all users. However, they are binary and do not distinguish between general users and friends. No personal information except name, gender, date of birth and email address is required during registration. These are not included in the user profile.

Users could select for their profile page to be private from all other users, restrict others from seeing their online status and prevent friendship requests. Privacy options did not allow users to customize privacy settings regarding specific groups of people or specific contents. In practice no personal information could be shared with other users, not even with friends. By default, in both versions, profile pages of ‘strangers’ can be accessed (unless they are set to private) by clicking on their Habbo when in a public room. Other users of the virtual hotel could be muted or blocked from entering the user’s private rooms. During testing a minor muted out an adult’s chat. The functionality was easy to use by clicking on the adults’ speech bubble and then the button “Mute”. Information on this functionality could be found through the “Help” button under the heading: “How to get rid of a bully/troublemaker”. Once clicking the mute-button, the adult’s chat messages were no longer visible on the minor’s screen. One could also remove friends from private rooms. During testing the minor blocked an adult from her living room after which the adult could not return to that specific room. Removing and blocking characters was easy and the functionality could easily be used by clicking the unwanted character.

The service does not delete profiles on request. In the British version this information is included in the customer support pages, and users are advised to scramble their password, change their email address, remove their furniture from their rooms, delete their rooms and spend any outstanding credits before they cease using their account. In the Finnish version of the site, there was no specific information on how to delete one’s account. However, some information is found in the “how can I delete an old character?” section where users are advised to move their furniture to a new character and to stop using the old character because, as stated in the FAQ section, Habbo administration removes characters from the database that have not been used in over 12 months as part of routine service maintenance. In none of the versions tested, there is information about what happens to the users’ information after ceasing use of their account or deletion.

The main strength of the SNS in relation to Principle 6 is that privacy settings are effective and easy to use. However, they lack complexity and do not enable users to distinguish between general users and friends. Users are also unable to delete their account, and the suggested alternative may be seen as difficult or overly time consuming by young people.

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

#### *Main findings in relation to the self-declaration*

According to the self-declaration, the SNS provider assesses their service to identify potential risks to children and young people by means of human moderation supported by automated (e.g. filters) tools. “Community management, moderation and player support functions are assessed regularly and a headquarter lead team constantly develops the procedures and ways of working”. The provider claims that their online environment is closely moderated and monitored, but also that safety education is promoted on the site. These are the main types of procedures employed by the SNS provider in order to promote compliance with the Terms of Service, Acceptable Use Policy and/or House Rules (e.g. human and/or automated forms of moderation; technical tools (e.g. filters) to flag potentially illegal or prohibited content; user-generated reports, etc.

Habbo claims that where human moderators are employed, reasonable steps are taken to minimize the risk of employing candidates who may be unsuited for work which involves real-time contact with children or young people. According to the provider, experienced and trained adult moderators are in charge of monitoring Habbo environment and these moderators’ backgrounds are checked when hired.

Because of ethical reasons, Principle 7 was not tested on the site.

## Summary of Results and Conclusions

On the website, Principles 1, 2, 4 and 6 were very satisfactorily assessed. Principle 3 was rather satisfactorily assessed. The main strengths of this SNS are the safe approach towards sharing personal information and privacy and also the user-friendliness and effectiveness of the reporting mechanisms available on the site. Areas for further improvement include:

- In theory, users were not allowed to upload their personal information on the site. However, as tests demonstrated, personal information could be disclosed in chat rooms, on stickies and the guestbook.
- Even though the use of filtering and monitoring tools in the service work effectively, there are ways to circumvent these mechanisms (e.g., by describing phone numbers in words).
- Privacy settings are easy to use. However, they lack complexity and do not enable users to distinguish between general users and friends.
- It is not possible to delete a profile, although Habbo administration removes characters from the database that have not been used in over 12 months as part of routine service maintenance.

### Assessment of the Principles in the Self-declaration

<i>Principle</i>	<i>Very satisfactory</i>	<i>Rather Satisfactory</i>	<i>Unsatisfactory</i>
1	x		
2	x		
3		x	
4		x	
5	x		
6		x	
7	x		

### Implementation of the Self-declaration on the SNS website

<i>Principle</i>	<i>Very satisfactory</i>	<i>Rather satisfactory</i>	<i>Unsatisfactory</i>
1	x		
2	x		
3		x	
4	x		
6	x		

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