

IMPLEMENTATION OF THE SAFER SOCIAL NETWORKING PRINCIPLES FOR THE EU MICROSOFT WINDOWS LIVE

*Brian O'Neill, Dublin Institute of Technology, Ireland
Verónica Donoso, Appointed Research Coordinator by the EC*

Introduction

Windows Live is the collective brand for Microsoft's suite of free web services and software applications designed to allow users to store and organise their communication activities and digital content in one place. The majority of the services are web applications accessible through a browser. Windows Live Essentials is a set of software programmes which are downloaded and installed on users' PCs and include a Family Safety application. First announced in November 2005, Windows Live brings together a wide range of products and services including email, instant messaging, online storage and photo sharing, as well Office Live online collaboration. Closely linked to the Windows operating system but available separately and on a cross-platform basis, Windows Live is primarily a suite of productivity and communication tools with social networking functionality. According to Microsoft's Self Declaration statement, Windows Live services are general use services and are not primarily directed at children under the age of 18.¹ However, services such as Windows Live Messenger, the instant messaging service, has over 300 million active users across the world and is popular with children while Windows Live Hotmail is, according to comScore, the world's largest web-based email service with nearly 364 million users.²

Summary of main findings

This report summarises the main findings of the tests carried on Microsoft Windows Live in the period June 11, 2011 to June 16, 2011. Windows Live is a web-based set of applications and social networking environment that includes email, photo and file sharing. While not described as designed for children, it incorporates Windows Live Messenger, an instant messaging service that remains very popular among young people.³ It also includes the separate Windows Live Family Safety application. This is a free, desktop-based software filtering tool that needs to be downloaded from the website and installed on each computer used by the child to be effective. Safety information and enabling tools and technologies are prominently featured in the different applications and services offered by Windows Live. The Windows Live Terms of Use and Code of Conduct statements provide users with easy to understand information about the services, including safety information. There is a help site, accessed from the main menu to a dedicated Windows Live Family Safety Help Center though this only refers to the separate parental controls software and not to safety in general. Additional resources and educational materials are provided on Microsoft's central safety and security website. This is not as easily found. There is a link to it from the Windows Live Microsoft Service Agreement (under Parental Controls) and it does contain child and teen-oriented materials. Not all users will be aware of its existence, however.

Testing was undertaken on the various services offered on Windows Live both with and without the use of the Windows Live Family Safety software. The available tools for reporting abuse or violations are accessible, easy to use, and were found in tests to be effective. Privacy settings across the range of services, which includes instant messaging, email, profile, photo and file sharing, were likewise found to be easy to set up and to maintain. Some difficulties were encountered in restricting information within a profile's contacts list (see Principle 3 below) but in general, the website's default safety settings are effective in ensuring minors' personal information is secure and blocked from external access. The Family Safety software provides added protection for parents in supervising online communication and web access for child and teenage users. The software is easy to install and integrates well with the Windows operating system. It does require more input from parents in operating and maintaining a parental controls application and must be installed on the computer used by the child to be effective.

¹ MICROSOFT Windows Live, EU SNS Safer Social Networking Principles Self-declaration Form
5th November 2010.

² <http://www.microsoft.com/presspass/newsroom/msn/factsheet/hotmail.mspx>

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 provider states in its self-declaration that the “primary online safety education site is centralised and broadly available to *all consumers*” via the “protect site”. The provider also claims to provide “Kid-specific social networking guidance” (targeted at parents) and other safety guides and materials (for educators and other consumers) through the corporate website (e.g. a safety and security tips blog, general social networking tips, monthly safety and security newsletter for parents and consumers in general, an online safety channel on YouTube, etc.). However, it is not clear from the self-declaration if any of this information is specifically targeted at children or how this safety information (available on the corporate website) is made available to children and young users via Windows Live. Microsoft further claims to offer plenty of educational materials and participate in a number of initiatives that support the education of parents, carers and teachers, as well as that of younger users regarding online safety. According to the self-declaration, free Family Safety features are available via Windows Live.

The signatory states in their self-declaration that they provide a Code of Conduct with clear information about “various prohibited uses of the Windows Live services” and the consequences thereof. These prohibited uses include, for example, uploading, transmitting, distributing or facilitating any content that depicts nudity, that incites, advocates or expresses pornography; soliciting or collecting personally identifiable information of any minor, etc. The provider claims that the code of conduct, the Terms of use and the Privacy link are available from every page and there is a link to the Terms of Use and privacy Policy on the sign-in page as well. According to the provider, “all users must review and accept the Microsoft Service Agreement (also known as “Terms of Use”)” when they register to the service. The Terms of Use incorporate the Windows Live “Code of Conduct” and the privacy Statement.

Main findings in relation to the website

The Windows Live environment is an application-rich web space in which users organise their digital content and online interactions through the use of email, instant messaging, photo and file sharing, and accessing other programmed content on MSN. Although the safety information and features are easily accessed across these diverse services, within the Windows Live environment safety information is not specifically targeted at children. The primary focus in Windows Live is given to parents and other adults responsible for children’s internet use. Users are referred through the help menu to the Windows Live Family Safety application which must be installed on the PC to take effect. Information and video tutorials aimed at parents guide users through the use of parental controls. Additional resources, not directly accessible from Windows Live (except via a link in the Microsoft Service Agreement), are mentioned in the provider’s Self Declaration statement and include central Microsoft Security and Safety web pages, a newsletter, blogs, YouTube and other downloadable educational resources. Topics addressed include social networking, privacy settings, and personal information security presented in clear, user-friendly language. Further information can also be found in the Windows Live Solution Centre, accessed from the Help link in the website footer. This includes a series of FAQs and a facility for registered users to ask questions.

The Windows Live Terms of Use are easily accessed from each page of the website. The Microsoft Service Agreement, while clearly laid out and visually accessible, is a long and complex document requiring a significant amount of scrolling down the webpage. The Code of Conduct is much more succinct and outlines in a very straightforward fashion allowed and prohibited uses of the services, rights and responsibilities of users, simple instructions about how to report violations of the code, and implications for abuses of the service. The Terms of Use provide a link to Microsoft’s central safety and security website (<http://www.microsoft.com/security/default.aspx>) which, while extremely informative and helpful, will be difficult for users to find unless they are already aware of it. No other link to this resource could be found within Windows Live.

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

Main findings in relation to the self-declaration

Even though Windows Live claims not to have any specific sections/services for adults only, the provider claims to limit the availability of some functionalities to younger users and to provide parents and

guardians with free “Family Settings” that help them manage their children’s online and offline activities. For instance, parents can decide if their child’s information can be shared with third parties or not. In the self-declaration, the provider also refers to a number of usage prohibitions applicable to their services. These include depicting nudity, inciting, advocating pornography, vulgarity, obscenity, soliciting or collecting personally identifiable information from minors, etc. Windows Live claims to review all hosted images by use of filters to detect pornography. According to the provider, minimum age requirements and/or parental consent may apply depending on the laws of each country where the service operates. If minimum age requirements apply, Windows Live claims to place a session cookie on the registration page so that “prospective users cannot change their age if their initial age is below the age required in a specific country for age verification.”

Regarding the functionalities put at the disposal of content providers, partners or users in order to label, rate or age restrict content where appropriate the provider states that they provide parents with “simple controls to monitor and protect their children”. These controls would allow them to set safer searching across all major search engines, “safer browsing with enhanced filtering choices” and safer social networking. The provider further claims that if parents add their child’s Windows Live ID to Family Safety, no paid advertisements will be displayed on live.com websites (at least when the child is logged into Windows Live). The signatory also claims that Microsoft Privacy Policy “provides parents with access to their child’s personal information (...) and gives parents the ability to delete the information and opt out of future collection of the child’s information.”

Main findings in relation to the website (without Family Safety enabled)

According to Microsoft’s Self Declaration statement, Windows Live are general use services and are not primarily directed at children under the age of 18. As such, specific age restrictions are not applied to content hosted on the service. The Windows Live Code of Conduct states that services are designed for individuals of 13 and over. However, where local laws allow, it is possible for under 13s to use the services. On a PC without Family Safety settings applied, it was possible to register an account for a minor under the age of 13. This did not require parental input and no restrictions were placed on the account set up. Microsoft ensures that services are age-appropriate by automatic blocking of any content that contravenes the Windows Live terms of service.

Main findings in relation to the website (with Family Safety enabled)

Windows Live strongly advocates the use of parental controls as a means of ensuring that services are age-appropriate. The Windows Live Family Safety is a software application available for download from the Windows Live website. The software needs to be installed by a parent on each computer used by a child in order for parental controls to take effect. With the use of Windows Live Family Safety parental controls, it is possible, for instance, to limit a minor’s internet access to just child-safe websites; to require approval for online friends; to specify who is able to contact the child such as by email or instant messaging; and to block access to other designated websites (e.g. Facebook and Myspace). For the purposes of testing, Windows Live Family Safety was set up for a child account. A range of settings were tested including “Child Friendly”, which blocks adult sites and online communication; “General Interest” which allows a wider range of web access but blocks social networking; and “Online Communication” which allows social networking but also blocks adult sites. One of the tests conducted consisted in limiting access to child-friendly websites suitable for a nine year old and blocking access to other sites that might not be deemed age-appropriate. All of these controls were found easy to install and operate; they proved to be effective in providing a high degree of parental control over all aspects of online search, web access and online communication.

Principle 3: Empower users through tools and technology

Main findings in relation to the self-declaration

In its self-declaration statement, the provider claims to employ a number of tools 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, according to the provider, the profiles of users registered as under 18 are not searchable and their Windows Live default setting is set to “friends” which means that only contacts that the user has added can view their information. According to the provider, users can control who can access their full

profile by, for example, being able to block other users or by rejecting friends' requests. The signatory claims that users can also change or conceal their online status and that they can allow access to their profile to specific users or groups, for instance, groups of friends, networks, etc. The self-declaration also refers to other functionalities put at the disposal of users including the possibility to "specify who can post and view comments on their shared photos, files, blog posts or guestbook" or the option to determine who can tag people in their photos and which other people can tag them in photos.

The service provider claims to educate parents about the uses and benefits of parental controls through the free available Family Safety and the tutorials that accompany them. The provider states that Family Safety focuses on safer social networking, safe searching across major search engines, and safe browsing with enhanced filtering choices.

Main findings in relation to the website (without Family Safety enabled)

Windows Live was first tested accessing its web-based services without the use of Family Safety parental controls. The Windows Live website provides a range of tools and technologies that are intended to ensure a safe social networking environment and to empower users to protect their privacy and personal information. Privacy settings for accounts of minors are by default set to 'Limited' and profiles of under 18s are not searchable by entering common search terms (e.g. age, name, etc.) via internal nor external search engines, although it was possible to find young users via their profile URL, for instance, by clicking on the profile of a minor contained in a friend's contact list.

One of the tests undertaken was to assess if it was possible for a minor to be contacted by people (registered users and non-registered users of this SNS) beyond their approved "friends" on their contact lists. Testing was carried out without the use of the Windows Live Family Safety parental controls – in other words just using the default settings for an under 18 account. Even though, the provider's self-declaration states that the default permission setting for Windows Live accounts for users under 18 is set so that only "friends" can view their information, testing demonstrated that information contained on a minor's profile, for example, a user's full name, information about schools attended, work and education, and interests/hobbies depending on how much detail a user has chosen to post - is visible, using the default setting, to other users beyond the minor's approved contact list⁴. In this test, the adult stranger, in this case a friend of a friend⁵, was also able to send a friend request to a minor though it was not possible to make contact through other means, for example, via private message or commenting on pictures, etc.

Users are advised when accepting friend requests to limit the access to information a friend can see about them. A category of "some friends" is a subset of the contacts list and does not include friends with limited access. Friends with limited access can see public information provided on the profile; "some friends" can see full profiles, including contact information. As declared in the provider's statement, it is possible for users to delete posts, remove tags or delete photos/videos on their profile. They can also by adjusting their privacy settings restrict access and control information on their personal profile such as deciding who will be able to view activities, photos and files, and contact information. Blocking of unwanted friend requests and reporting as spam is also easily achieved. Profiles of users under the age of 18 are also not searchable in any of the main external search engines.

Main findings in relation to the website (with Family Safety enabled)

Testing was also undertaken with the use of the Windows Live Family Safety application. The default settings for "Online Communication" were applied which allow access to general interest websites, allows social networking but blocks adult content. The controls are user-friendly, effective and easily accessed in the parental controls section of the PC. By default, with the use of Family Safety controls, profiles of minors are only visible to their approved contact list. Communication is blocked for any users not on their friends list. Emails from people who aren't on the list won't be received nor can Instant Messaging be used with anyone outside the friends list. The same test as above was conducted whereby an adult stranger attempted to make contact with a minor. In this case, the profile of the minor's account was not accessible nor was it possible to send a friend request. The default settings mean that parents control the minor's contact list and must approve any new contact

⁴ For the sake of this assessment, "the minor's approved contacts list" is equivalent to "only friends".

⁵ "Friends of friends" do not belong to the user's approved list of contacts and, therefore, even though they are befriended with the user's friends, they still constitute a group of potential strangers.

added. Safer default settings were therefore available with the use of Family Safety controls than on the Windows Live website on its own. A similar level of safety may be achieved on the website but it requires additional input on the part of the user and finer adjustment of profile privacy settings for the same effect.

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

Regarding the mechanisms employed to report inappropriate content, contact or behaviour that violates the Terms of Service Windows Live claims to provide a report link at the bottom of web pages on services where users can view, post or share user-generated content. Users can also report abuse via the menu in Windows Live Messenger or from the Windows Live Messenger application. “The Windows live web services include a “Report Abuse” button on pages where users can post, share or view other users` content.”

The provider states that the report abuse mechanism ensures that “the service handles *priority* abuse issues related to content users post or share via the Windows Live services”. This mechanism allows the appropriate flagging, reviewing and handling of issues such as child pornography or exploitation, as well as other priority safety fields (not specified in the self-declaration). The self-declaration further states that users are encouraged “to provide as much detail as possible regarding the abuse or offensive behaviour”. No information was found in the self-declaration regarding if the procedure to report inappropriate conduct or content is easily understandable for children or if it is age-appropriate.

Main findings in relation to the website

Reporting abuse is available by an easily accessed link on each page of Windows Live and is the principal mechanism for reporting abuse, offensive behaviour or violation of the code of conduct. A simple to complete form is provided asking users to supply relevant details of the incident or violations concerned. While Microsoft does not undertake to reply to every report, confirmation is given that appropriate action will be quickly taken. For this test, a sample complaint was filed asking for help to remove offensive images on a minor’s profile. A question was also posted on the Windows Live Solution Centre again requesting information about how to remove images. A reply was also received within one day. The images themselves were removed within two days and a response by email to the complaint was received five days later.

Principle 5: Respond to notifications of illegal content or conduct

Main findings in relation to the self-declaration

The provider ensures that they have mechanisms in place to respond to notifications of illegal content or conduct. These include the “Report Abuse” link and “Feedback” accessible from the service. The provider also states that reports of abuse (potentially involving illegal content or conduct) are responded and that they work “in close cooperation with law enforcement and government agencies in response to lawful request”. The self-declaration refers to a number of law enforcement agencies with whom the provider liaises, e.g. the INTERPOL. It also refers to the initiatives they’ve supported, for instance, the creation and the provision (at no charge) of the COFEE software (Computer Online Forensic Evidence Extractor) to law enforcement around the globe.

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

Main findings in relation to the self-declaration

Windows Live claims that users of this SNS are provided with a range of privacy setting options so that they can choose a default privacy setting from three privacy settings for their Windows Live profile, namely public, limited or private. By means of the so-called “privacy selector” the provider claims to allow users to determine their permission choices to share personal information and activities. The options include: everyone (public), “my friends and their friends”, “friends”, “some friends” and “just me”.

The signatory further states that users can also use “Advanced Privacy” settings which offer intuitive and user-friendly granular settings that allow to set permissions ranging from most to least restrictive. According to the provider, no automatic mapping of information takes place on their services other than the username selected for the creation of a Windows Live ID. The provider also claims that users are provided with the privacy settings page which allows users to view or to change the privacy settings used and which can be visited at any time by clicking a link on the user’s profile page.

Main findings in relation to the website (without Family Safety enabled)

The Windows Live privacy statement is accessible at any time from the footer of the website. The only information that is automatically mapped onto the user’s profile from account registration consists of name and surname. Users may optionally enter further details such as contact information (email, telephone, IM), schools attended, hobbies and interests. Instructions on how to delete an account are found relatively easily in the account management settings located within the profile page. Clear information is also provided about policies on deactivation and deletion of accounts. Users are informed that they may deactivate their account at any time by request. Deactivation rather than deletion is effected in the first instance as an email address is associated with the account. Once there is no log in after 270 days, the account is permanently deleted and all stored messages and content are removed.

The privacy settings for the account were tested both with and without the use of Family Safety parental controls. Privacy settings, providing options to select and modify permissions to access content on a user’s account, are accessed in both cases by clicking on the user’s profile page. These are user-friendly, easy to access and to adjust as required to each user’s preference. When used without Family Safety parental controls, three main types of settings ‘Private’, ‘Limited’ and ‘Public’ are available. By default, privacy settings for minors are set to ‘Limited’ i.e. the user’s profile containing any descriptive information about general interests, occupation and location is visible to all. Other information such as status, contact information and access to photo albums is restricted to friends only. Users can further adjust settings using either a basic or advanced mode. The former is an easy to use checkbox selection that defines the principal privacy modes. The more advanced settings allow users to modify individual settings with a finer degree of control over which aspects of a user’s information are visible and the kinds of online communication that are allowed. Windows Live advises users to enable additional settings to limit access for certain information to ‘close friends’. These were easy to manipulate, allowing users greater control over their personal information. However when contact information was set to be accessible to only ‘close’ friends, this was found to be visible also to the whole list of friends.

Main findings in relation to the website (with Family Safety enabled)

With Windows Live parental controls enabled, the account's privacy settings are managed in the first instance through the Family Safety application. Greater levels of privacy are enabled by default using the parental controls facility. For instance, profiles of minors are only visible to friends and may not be made public or visible to all. A user may also choose to further restrict access to certain parts of the profile (contact information, interests, photos) to some friends or to make some parts of it invisible. Contact management is also set by default to be controlled by parents who can then choose which communications services to allow and who the child can communicate with on Windows Live Messenger and Windows Live Hotmail. The default setting may be changed to allow the child to manage their own contacts but this still allows the parent to monitor the contact list. In tests, with Family Safety settings enabled, only friends could access and contact the test account of a minor. The profile was listed as private for other users and no information was visible.

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

Main findings in relation to the self-declaration

The provider claims to employ a range of automated technologies to ensure the integrity of their services and to allow users to report any violations of their Terms of Use. The provider also affirms that when they become aware of a violation to their terms of use or code of conduct (e.g. through user-generated reports), prompt steps are taken "to remove and take down illegal or prohibited content/conduct". The provider states that they have "established and trained personnel on (their) global processes and standardised practices to ensure that (they) respond in a consistent manner and to meet all applicable laws and regulations worldwide related to this subject".

Summary of Results and Conclusions

On the website, Principles 1, 2, 4 and 6 were assessed as very satisfactorily implemented and Principle 3 as rather satisfactorily implemented. The main strengths of this SNS are the availability of safety information and features that are easily accessed across diverse services. Another positive aspect are the tools provided to ensure the services are age-appropriate for the different categories of users. For instance, the Windows Live Family Safety downloadable application is an effective web filtering and parental control application that provides a high degree of flexibility for parents in monitoring and supervising children's internet use. However, its use requires extra input on the part of the parent to ensure maximum levels of safety and must be installed on the PC used by the child to be effective. Reporting abuse on the platform is easily available and efficient. Ready access to privacy settings by clicking on the user profile was found to be very user-friendly, effective and easy to manipulate, allowing users a high degree of control over their personal information.

Some areas of attention include:

- Lack of safety resources specially targeted at children rather than to the general public.
- Additional resources and educational materials provided on Microsoft's central safety and security website are relevant, but they are not as easily found via the Windows Live services tested.
- According to the provider's self-declaration, only friends should see a user's activity and information. However, information contained on a minor's profile, for example a user's full name, information about schools attended, work and education, and interests/hobbies depending on how much detail a user has chosen to post - is visible, using the default setting, to other users beyond the minor's approved contact list.
- During the tests without the use of Family Safety controls, contact information was set to be accessible to only 'close' friends. However, this was found to be visible also to friends.

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		

