

# IMPLEMENTATION OF THE SAFER SOCIAL NETWORKING PRINCIPLES FOR THE EU MICROSOFT XBOX LIVE

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## Introduction

Xbox LIVE is the online gaming and digital media entertainment service of Microsoft. First launched in 2002, Xbox Live has nearly 25 million members across 35 countries.<sup>1</sup> The use of the service requires an Xbox 360 console as well as a broadband internet connection: Xbox Live as a gaming and entertainment service now spans the Xbox360 console itself, and the PC (Xbox.com and Games for Windows Live). The Xbox 360 console is the primary platform of the service. This is where users play console games, play online and access movies, other entertainment available through Xbox Live. On the website, users can view and edit their profile, access the Xbox Live Forums, adjust their safety settings and preferences, and search for information about games. The same account and username (gamertag) applies in both cases. Xbox Live membership is available in three main forms: Xbox Live Free provides access to entertainment services and content via broadband connection; Xbox Live Gold Membership includes multiplayer online gaming; and Xbox LIVE Gold Family Pack is a family bundle for up to four 12-month Xbox LIVE Gold memberships. The Xbox LIVE service is intended for users of all ages. Functionality may be limited for younger users and parental controls are provided for managing children's use. Xbox LIVE requires parents or guardians to create accounts on behalf of children.

## Summary of main findings

This report summarises the main findings of the tests carried out on the Xbox Live service accessed through the Xbox 360 console and Xbox.com website in the period from June 11, 2011 to June 19, 2011 using an Xbox Live Gold membership. Safety controls and supporting information across the Xbox Live gaming and entertainment services were found to be extensive and effective. Safety education is presented in a way that parents and young people will find accessible and user friendly. In general, resources are easy to find despite some initial difficulties experienced in locating safety content. The Xbox Live Code of Conduct which applies to both the console and the website is a clear and succinct statement of the standards of behaviour and content required of its users. Players can easily report violations of the code and Xbox Live undertakes to review every complaint filed. Privacy controls are easy to set up and modify as required both on the console and on the website. Parents are required to give consent for registration of accounts of hereafter, parents choose the level of permissions they wish their children to have. Xbox Live users control the information placed on their profile and to whom it is visible. Unwanted communications may be blocked and/or restricted, and friend requests are controlled according to easily accessed safety settings.

## 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 the provider, Xbox Live provides plenty of comprehensive online safety content which is "available and easily accessible through [www.xbox.com](http://www.xbox.com)". The most comprehensive and context relevant information is also available through the Xbox console. This includes videos with tutorials and information on how to use the Xbox Family Settings, privacy settings, and abuse reporting mechanisms. The provider further states that "primary online safety education site is centralised and is broadly available to *all consumers*" via the corporate "protect site". According to the provider, other types of safety resources are also available through this corporate website. These include a safety and security tips blog, general social networking tips, an online safety channel on YouTube as well as a monthly safety and security newsletter for parents and consumers in general.

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<sup>1</sup> MICROSOFT Xbox LIVE EU SNS Safer Social Networking Principles Self-declaration Form , 5th November 2010

From the self-declaration it is not clear, though, if this safety information is specifically targeted at children and younger audiences or how this safety information (available on the corporate website) is made available to children and young users on the Xbox Live website and/or the Xbox console.

The signatory states that they provide clear information about what constitutes inappropriate behaviour on their services and the consequences thereof, e.g. if a player is caught cheating or “griefing” (making it hard for others to play), the offender can be muted or suspended for a certain period of time and the offender’s account and/or console may even be banned from Xbox LIVE permanently.

Microsoft claims to have education partnerships with a broad range of institutions and to offer plenty of educational materials and participate in a number of raising awareness initiatives that support the online safety education of families, carers and teachers, as well as that of younger users.

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

Xbox Live, through its website and on the Xbox 360 console, provides extensive information and educational resources aimed at raising awareness of internet safety and privacy protection. As an online gaming and entertainment service with social networking features, the information provided is practical in nature and intended to provide users with the necessary skills to use Xbox services effectively and in a safe manner. Safety and educational resources are targeted separately at parents and at teenagers.

Some difficulties were encountered during the tests in locating safety resources, but once identified were found to be comprehensive and informative. A link from the main menu to the Family Center, the Xbox.com location for safety information, didn’t work in the test.<sup>2</sup> It was also necessary to perform several searches of Xbox Live Support to locate further resources. A special online safety website with a focus on gaming is provided as part of the Xbox Live service (<http://playsmartplaysafe.eu/>). Once registered and logged in, a link is provided on the welcome page of the website. Microsoft’s primary online safety website (<http://www.microsoft.com/security/default.aspx>) also contains additional information for parents and young people on all aspects of internet safety, privacy and security.

The safety information available via the console is more limited. The ‘Xbox 101’ video tutorials, mentioned in the provider’s Self Declaration statement, could not be found on the console. A web search revealed the videos were located in the Community section of the Xbox.com website and on You Tube. The content itself was informative and very practical in nature, ideally suited to the gaming environment and the target audience. Other useful resources available from Xbox.com include fact sheets, testimonials from Xbox Family Ambassadors, community help resources and a safe gaming guide. Materials for download include a *Family Guide to Video Gaming*, a checklist for parents on digital technology, and quizzes about young people’s gaming habits. There is also a dedicated safety website and series of FAQs for the Kinect controller. Two key audiences stand out as targeted by the safety information on Xbox Live: parents or those responsible for setting up younger children’s Xbox accounts; and teenagers or young adults, the main users of Xbox services. There is little evidence of safety information specifically designed for younger children. The available resources are, however, written and presented in a very user-friendly way and will be both informative for new users of all ages and effective in providing solutions and guidance for more experienced users. There are useful links to external sites and organisations and a link is available to the PEGI (Pan European Game Information) website on the footer of each webpage providing additional information and resources.

Terms of Use for Xbox Live are easily accessed from any page of the website linking to two separate pages outlining the Xbox.com Service Agreement and a Code of Conduct. The latter is an exemplary, jargon-free statement that gives users clear information about what is expected of them, the consequences of violations of the code, and of potential risks they might encounter. Terms of Use are somewhat more legalistic in form but are clearly laid out and presented. Accessing the Terms of Use on the Xbox 360 console is less easy. After much searching, they were located via the Dashboard under Account Management settings. Reading text via the Dashboard has natural limitations: It is harder to read and involves scrolling on a single page. There is no specifically adapted version of the Terms of Use or the Code of Conduct for children or younger people.

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

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

Regarding the mechanisms through which the service provider ensures limited exposure to potentially inappropriate content and contact for children, the provider claims to limit the availability of some functionalities to younger users (e.g. more conservative default profile settings apply or parental permission is

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<sup>2</sup> [http://www.xbox.com/en-GB/Live/Home?friends\\_and\\_family](http://www.xbox.com/en-GB/Live/Home?friends_and_family)

required to perform certain actions). Besides, the self-declaration mentions that mature-rated content such as certain games can be blocked and/or be hidden from minors. No minimum age requirements apply, but a birth date and parental consent are required for minors to sign up to Xbox LIVE. For users under 18, these data are verified by entering credit card details. As stated in the self-declaration, "Xbox live requires parents or guardians to create accounts on behalf of their children accounts, and requires that the parent or guardian is responsible for the use of the account by the child."

As regards 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 claims that Xbox allows parents or guardians to specify which categories of games and movies their children are allowed to access. This is achieved by means of "Family Settings" that help them manage their children's online and offline activities. Besides, the console can be configured to restrict online gaming, communication and the sharing of personal information e.g. to only approved friends or to require parental approval for new friends. Furthermore, the console recognizes several game and video rating systems, e.g. PEGI.

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

There is no minimum age for Xbox or Xbox Live services. However, extensive tools are provided to ensure the services are age-appropriate for the different categories of users. These may be used to limit content that can be viewed or played, protect privacy or limit the amount of time spent on the console and on Xbox Live. The two main ways of enabling family settings are the "Family Centre" settings in the case of Xbox LIVE Family Pack subscribers, and console "Family Settings" for individual accounts. Family settings are accessed via the welcome screen on the Xbox 360 console and are accessible at any time. The same settings can also be monitored and controlled online at Xbox.com. Three main default settings are presented for child, teen and adult accounts respectively. Accounts for under 18 year olds need to be set up by an adult and are verified by entering valid credit card details. Parents are also required to be responsible for child or teen accounts and to authorise any amendments to default settings. A valid Windows Live ID is required to set up Xbox Live access. PEGI and BBFC (British Board of Film Classification) ratings are used for games and movie content and permissions may be set within console family settings.

During the period of testing, the console and online safety settings proved to be easy to set up and use, and effective in restricting access to content that may not be age-appropriate. Exceptions for game play or communications purposes could be added if required such as by allowing an age-restricted game or approving a friend request with parental approval. Despite the very diverse services incorporated within Xbox Live such as gaming, entertainment, film and video content, online communication, online and console safety settings and parental control features remain readily accessible, are easy to set up and manipulate as required for the particular service.

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

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

As regards the tools and technologies employed by the service provider to assist children and young people in managing their experience on their service in particular with regards to inappropriate or unwanted content or conduct, the provider claims to have taken a number of steps in order to ensure that private profiles of users registered as under the age of 18 are not searchable, for instance, even though gamer tags can be searched, blocked profiles (i.e. users younger than 13) only reveal minimal information (gamer tag and gamer score) and 13-18 year olds can only share their profile with friends. According to the provider, profile sharing for under 13 year olds is blocked and 13-18 year olds can only share their profile with friends. Besides, the self-declaration states that adding new friends is blocked, by default, for all under 18 year old children and parental approval of a child's list of online friends is needed.

The provider further states that users can control who can access their full profile by, for example, being able to mute a player's communication, block further interaction with a particular user, etc. Parents or guardians also have plenty of choices to manage, and eventually, restrict their children's experience and playing environment (both online and offline) on Xbox LIVE through the Xbox Live Family Settings and the tutorials that accompany them.

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

Tools and technologies available to users on Xbox Live are designed to give the user control over online interactions in the course of gameplay or other entertainment activities. Users create profiles which may include

a brief motto, personal picture of their avatar, name, bio, and location. Profiles for child accounts are invisible by default. Child account holders may only accept friend requests with parental consent. Communication, whether by text, messaging or chat is restricted to friends only. Teen accounts by default make profiles visible to friends only and also require parental approval to accept friend requests. Likewise, online communication whether by text, messaging or chat is restricted to friends only.

During the period of testing, a number of 'fake' Xbox Live accounts for both the console and website were set up to assess the extent to which access to personal information and online interaction was visible or accessible beyond a user's approved contact list of friends. Profiles of minors, registered users under the age of 18, were not accessible in either internal or external search engines. Adults registered on the site could only find the profile of minors if they know the URL. The visible profile in such instances contains only the username or gamertag, the user's avatar and game scores. Identifying information is not featured in gamer profiles though users are free to add further details in their own bio. There is no facility to post comments, pictures or other content on a user's profile as is the case for other SNS services. In the case of Xbox Live, gamers may rate other players by submitting a gamer review. Abuse of the gamer reputation feature may be deemed a violation of the code of conduct.

Xbox forums are another feature of the Xbox Live service accessed from the Xbox Live website. Participation in Xbox forums is not subject to the same online safety settings that apply for other aspects of the service and separate preferences need to be set to either allow or block communication in forum conversations. If enabled, users may join in conversations, start new threads or communicate with other members by private message. By default forum participation is enabled and in this way, it was possible for an adult – in this case a friend of a friend - to send a private message to a minor within a Community Forum. A friend request was also sent to the minor's account. Friend requests for minor accounts by default require parental approval. Parental consent is not needed for participation in Xbox forums, however, including communication with other members via private messaging.

Apart from this exception, online and console family settings proved to be robust and effective in maintaining secure settings for younger players.

#### ***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***

According to the self-declaration, in Xbox LIVE users can complain about a players' inappropriate behaviour or content including the use of inappropriate language or profile content, as well as actions such as cheating or griefing. The provider also claims that interactions with other users can be muted and players can be blocked. According to the provider, it is also possible to report an incident by directly selecting an offender's user profile (e.g. another gamer) and report them in case of inappropriate behaviour. After receiving a complaint, the provider claims to review each report for accuracy. If the complaint is valid a number of actions can be taken against the offender including suspending the offender for a certain period of time or banning the offender's account and/or their console from Xbox LIVE permanently.

The self-declaration does not explicitly refer to if the procedures to report other user's content or behaviour (mechanism 2) are easily accessible or if the procedure to report inappropriate conduct or content is easily understandable for children. The self-declaration does not provide concrete information on if users are provided with an indication on if their reports are acknowledged nor information on how reports are typically handled.

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

A number of mechanisms are provided to enable users report content or behaviour that violates the Terms of Service. In the course of gameplay or other online interaction, users may block communications from individual players. They can remove them as friends and/or submit player reviews. In Xbox Live Forums, accessed on the website, users may flag posts as abusive. The main way of reporting abuse on the console is through filing a complaint on a player's profile. The instructions provided on how to report and file a complaint are clear and readily accessible. In making a complaint, a user is asked to provide precise information concerning the nature of the violation. Typical violations cited include abusive communication through text or voice or video/picture communication, or tampering with the system (e.g. attempting to influence player feedback or tampered with a game or console). An option is also provided to submit a player review rather than a complaint. During the test, a sample complaint was filed using the console about another player for harassing and bullying behaviour. No difficulties were encountered and confirmation of successful submission was given. A notice was given following submission that according to its Terms of Service, XBOX Live review every complaint but will not disclose the status or results of individual complaints. Accordingly, the player who submitted the complaint had

no follow up communication from the provider and did not know what effect, if any, their report had. No evident action was taken against the profile reported either.

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

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

As stated by the provider in the self-declaration, apart from existing mechanism to report abuse, there is a complaint centre where users can report abuse on the website. Besides, the provider claims to have also “deputised certain trusted individuals” to report inappropriate content found on the service. “Their reports automatically lead to a service penalty for that offender appropriate for the severity of the offense”.

Xbox LIVE’s self-declaration specifies how the provider deals with the reviewing of content and the setting of penalties for offending users. However no explicit information is provided regarding how they deal with the removing of inappropriate, offending or illegal content. Xbox LIVE claims to work “in close cooperation with law enforcement and government agencies in response to lawful request”.

### ***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 provider states that when setting up privacy settings, users are given relevant information regarding how to control access to their profile and game play information including their gamer profile and played games. On every page of Xbox.com users can access the “Online Privacy Statement”. The provider further claims that this information can also be accessed from the console. Details on the privacy policy are also available from links to the Microsoft website and can be accessed on every page of Xbox.com. The self-declaration mentions that users can control who sees their profile and game play information. For instance, users can decide who sees customizations made to their gamer profile including name, location and bio. It also specifies that when creating a child account, parents are alerted “to the fact that their child’s name, location, and bio are visible to anyone the parent allows. If they choose to make this information available to the child’s friends, they can also choose to approve with whom the child can be Xbox LIVE friends”.

The self-declaration does not make explicit if privacy settings are easily accessible, prominent or if they are available at all times.

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

Privacy settings are an integral element of the Xbox 360 console and Xbox Live online safety settings. The Xbox Live Privacy Statement is available on each page of the website and in the Account Management panel of a user’s profile on the console. Extensive controls are provided over how personal information is made visible or hidden from other players. Default settings enable maximum privacy through standard profile options for child and teen accounts. Modifications may be made which alter specific aspects of information visibility and clear instructions and guidance is provided. Online privacy settings can be accessed at any point from the user’s profile on both the console and on Xbox.com and are prominently displayed. However, teens and child users require parental consent to make any changes. A parent must log in with their Windows Live ID to approve any changes to safety settings.

Users have control over the relatively limited information available in gamer profiles and are able to restrict other features such as online status and game history. Modifications to privacy settings are easily achieved which allow users to block access to their profile, to share it with friends only or to make it visible to all. By default, access to a child account profile is blocked while a teen account profile is visible to friends only. Setting privacy options for Kinect sharing also requires special attention: even if a teen account is set to friends only for video communications, users also need to set additional controls for Kinect sharing of data (videos and photos) outside of Xbox Live. This does not affect any privacy settings for communication, however. Online resources provide additional guidance on the importance of privacy controls and are strongly reinforced through safety websites such as the dedicated online safety website <http://playsmartplaysafe.eu/> and Microsoft’s Safety and Security Center <http://www.microsoft.com/security/default.aspx>. Reference to the manual or online support may be required in order to find out how to delete a profile. This is done through System Settings and selecting Gamer Profiles on the Memory tab. Once located, deletion of a user profile is straightforward and easy to manage.

## *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. The self declaration indicates that when the provider becomes aware of a violation to their terms of use or code of conduct (e.g. through user-generated reports), they “take steps to remove and take down illegal or prohibited content/conduct”. Finally, in their self-declaration Xbox Live indicates that they employ especially trained personnel on (their) global processes and standardised practices so as to ensure a consistent way of responding according to applicable laws and worldwide regulations related to this subject.

## **Summary of Results and Conclusions**

On the website, Principles 1, 2, 3 and 6 were assessed as very satisfactorily implemented and Principle 4 as rather satisfactorily implemented. The main strengths of this SNS are the availability of targeted safety information for minors and carers. This information is practical in nature and intended to provide users with the necessary skills to use Xbox services effectively and in a safe manner. The extensive tools provided to ensure the services are age-appropriate for the different categories of users are another positive aspect. Parental control features are readily accessible, easy to set up and to manipulate. Teen accounts by default restrict profile sharing to friends only and also require parental approval to accept friend requests. Default settings enable maximum privacy through standard profile options for child and teen accounts. Reporting inappropriate content or behaviour is easy and deleting a user profile is straightforward and easy to manage. Some areas of attention include:

- Some difficulties were encountered during the tests in locating safety resources, but once identified were found to be comprehensive and informative.
- There is little evidence of safety information specifically designed for younger children. The available resources are, however, written and presented in a very user-friendly way and are informative for new users of all ages.
- Online communication in the accounts of minors, whether by text, messaging or chat is restricted to friends only. However, despite this, it was possible for an adult – in this case a friend of a friend - to send a private message to a minor, but only within a Community Forum.
- During testing, a player submitted a complaint about another player for harassing and bullying behaviour, but they received no follow up communication from the provider and did not know what effect, if any, their report had. Furthermore, no evident action was taken against the profile reported either.

### **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>
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1	X		
2	X		
3	X		
4		X	
6	X		

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