

# IMPLEMENTATION OF THE SAFER SOCIAL NETWORKING PRINCIPLES FOR THE EU SKYROCK

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## Introduction

Skyrock is a French speaking blogging platform, initiated by a popular French radio. It is specifically dedicated to teenagers. It exists mainly in French, but also in English, German, Italian, Spanish, Dutch and Portuguese. It was launched in 2002. According to Skyrock Website, it holds nearly 25 million profiles (on April 04 2011). The minimum age to register on this platform is 12. Here users can create profiles and blogs. On blogs, users can post articles, usually consisting of a picture and a short text. Skyrock is primarily based on the sharing of blogs with friends rather than on the use of and the sharing of applications such as quizzes, games, etc.

## Summary of main findings

In Skyrock the safety information available for children, parents and educators is comprehensive, easy-to-understand and accessible. The reporting mechanism is easy to find and to use. Privacy settings are limited, but they are accessible and easy to use. Any user can set his/her blog to “secret”, but the “profile” cannot be made fully private.

Other features of Skyrock include: adults who are not befriended with a minor (including “friends of friends”) cannot invite him/her to a private discussion. On chat rooms, a visible message warning users to never communicate personal or contact information is displayed.

Some of the main strengths of the site are the availability and the quality of safety educational materials and the reporting mechanism, which proved to be easy to use, extremely rapid and efficient. One of the main weaknesses of the service provider is that, despite what is stated in the self-declaration, no mechanism to prevent the re-registration of under aged users (e.g. cookies) was found.

## *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*

Skyrock claims to provide clear, targeted guidance to minors and parents on how to navigate the website safely “in a prominent, accesible and easy to understand format”. It also claims to provide education and tips about online safety and privacy in a clear, relevant and age-appropriate language throughout the site. These materials include, for instance, the anti-bullying campaign developed by INSAFE. The self-declaration also mentions that all users receive contextual security warnings whenever they are about to post content on the platform.

In relation to the Terms of use, the self-declaration states that before accepting the terms, users are offered a short, child-friendly summary of the “users’ major engagements” with the site, but no concrete references were in the self-declaration regarding the consequences of inappropriate behaviour on the site.

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

Confirming what is stated in the self-declaration, Skyrock provides very clear and comprehensive educational materials, targeted to children, parents and educators. It gives advice on topics such as privacy and reputation e.g. “never give out personal information”, “never publish anything that could later embarrass you”); how to deal with inappropriate content, etc. Simple warnings and ways of dealing with many problems are explained to children and children are encouraged to talk to adults or contact Skyrock if they encounter any problem. This information is accessible through the “safety” (“sécurité”) link at the footer of the page. On the “parents” page,

there are several links to organisations promoting a safer Internet (such as Insafe, e-enfance, Internet Sans Crainte, etc.).

Inappropriate behaviours are explained in the safety page using clear and non technical terms. The consequences of breaching the rules governing the site are explicitly developed in the general Terms of Use, however these are explained using rather technical and legal jargon while no concrete examples are given. Thus, the consequences of breaching the rules may be somehow difficult to understand for Children.

In both the parents and children safety page, children are explicitly warned that the information they post online may be spread worldwide and that it may even be used several years later.

Users may also access the “terms and conditions” (“conditions generales d’utilisation”) page from the footer and from the “safety” page. A simplified Terms of Use version is easily accessible from the page especially targeted at children, and is easy to understand by children. All the information is in an adapted to children and complete textual format. Skyrock does not provide any videos or other formats to illustrate safety messages or the terms of use.

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

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

The minimum age requirement to create an account on Skyrock is 12 years old. Skyrock claims to use a filtering algorithm to seek and delete individuals misrepresenting their age. According to Skyrock, the age registered by the user will determine which categories of age groups the user will be able to contact or be contacted by. As stated in the self-declaration, “*Skyrock employs cookies sessions, permanent cookies, email and IP addresses on its registration page to flag users who will change their age if the initial age was below the one specified in terms of Use*”. The provider also claims that their staff “actively searches out underage users manually. Upon discovery that a user is not 12 years or older, Skyrock.com deletes the user’s account, blog and profile.” Furthermore, a filtering algorithm that seeks and deletes users misrepresenting their age is in place.

Skyrock further declares that the service does not host any “adult” content and that it does not have any specific sections for adults only. Besides, the provider states that they use a filtering algorithm to forbid certain words, expressions and URLs considered as inappropriate. Apart from this, Skyrock claims to only display safe advertising banners and “family safe Google Ads”.

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

As stated in the self-declaration, the minimum age to register is 12. Children may access any page from Skyrock, as no part of this SNS is unsuitable for children. There are no sections or content labelled as “adult-only” on Skyrock. Regarding commercial content, there is an advert on every blog. Throughout the testing, no advert that could be considered as “unsafe” or “unsuitable for children” was found (e.g. adverts for Internet Explorer, Skyrock Videos, a commercial social network).

As our tests demonstrated, when a 9-year old child tried to register on Skyrock registration was denied. This was made explicit to the user by displaying the following message: “*You must be 12 years or over to sign up to Skyrock!*” and by taking the user back to a form where the age field was highlighted to be filled in. By providing a 12+ age on the age field it was possible for the 9-year old (created for this test) to successfully register on the site. Our tests (with Mozilla Firefox 3.6.16), therefore, suggest some deficiencies in the flagging system and the active manual searching of underage users referred to in the self-declaration as these mechanisms proved not to be effective enough in identifying and deleting an underage user from their service<sup>1</sup>, at least during the period that the testing lasted.

In Skyrock, there are no parental control tools available. However, children are encouraged (through the “safety” page) to talk about their blog with their parents, while clear and comprehensive safety information is given to parents to accompany their children on Skyrock.

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<sup>1</sup> According to the provider an account that is flagged as “suspicious” will be removed by the moderation team if it appears that the user is really underage.

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

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

Skyrock employs several tools and technologies in order 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, users can choose with whom to interact (although Skyrock limits the interaction between users who do not belong to the same age group). According to the provider, users can also manage posts and comments, as well as who post them, in their profile; they can also block other users, and prevent their images from being forwarded to other sites.

Skyrock also maintains that various tools are employed “to identify anomalies in how a user might be using Skyrock.com. Users’ behaviours are then rated and users can be excluded from the website.” Skyrock claims that user reporting is also used as a mechanism to flag illegal content or behaviour.

The self-declaration indicates that users under the age of 16 are unsearchable on search engines. Nothing is mentioned about 17-18 year olds, though. Still, it is not clear from the self-declaration if profiles of minors are set to “private” (by default).

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

On Skyrock, any user has both a profile and a blog. On the profile, the information available to others depends on the fields filled in by the user. It may include nickname, age, gender, country and place of residence, hobbies, list of contacts, pictures, etc. All this information is visible to other users (registered or not), and there is no obvious way to set the profile to “private”. Profiles were not found using either an external search engine (e.g. Google) or the internal Skyrock search engine. The only way to find a profile is by knowing the username.

On the blog, users upload photos and texts in the form of short articles. Blogs can be set to “secret”. In that case, only friends labelled as “VIP” by the user himself can access the blog. Neither the blog nor the profile, are set to “private” by default.

Any user, including minors, can be contacted by other users, including adults. Indeed, during the tests, one of the minors was contacted by a young adult. By default, all users (registered or not, friends or not) can either send a message; post a comment on the minor’s profile or on their blog. However, privacy settings can easily be modified so that anyone, only registered users, only friends, or only best friends can post a comment on the blog. It is also possible to set one’s profile so that any registered users or only friends can post comments on the profile. However, some differences appeared in the possibilities to contact minors, though privacy settings were set to the same level. On one profile (aged 17), anyone could “send a message” and/or post a comment on the profile or the blog, whereas on the other two profiles (aged 12 and 16), it was possible only for friends.

Users can also choose to pre-validate or not comments on their blog. Even when comments are not pre-validated, Skyrock provides users with a useful mechanism that allows them to validate, invalidate or delete new comments posted on their profile or blog. However, during the test, the invalidate option was displayed but could not be chosen, even when the user chose to pre-validate comments.

On the profile, users can choose to pre-moderate comments. Users can use the same mechanism as in the blog to validate or delete comments (the “invalidate” option is displayed as well, but is not clickable).

On the chat room, an adult user cannot invite a minor to a private conversation. In addition, users are warned in a very visible and explicit way that they shall never communicate personal information (e.g. telephone number, home address, etc.).

On Skyrock, it is possible to forward user’s pictures to another SNS (e.g. Facebook). Forwarding a picture on Facebook means that the picture will appear on the Facebook wall of the user with a link to the blog article and eventually a comment. The process is simple. It is also possible for users to disable this option from the personal settings option page of the Skyrock account.

Skyrock provides a simple mechanism to block users: for instance, when a registered user sends a comment, the user can go on his/her profile and choose to block him/her by clicking on a visible option in the menu.

When receiving friends requests, users can choose to accept it (become friends or best friends), refuse it, or wait. Users are also provided with a link to visit the blog of the requester.

### ***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, there is a “Flag this content” button to report illegal content or behaviour on the site.

The provider states in its self-declaration that a report abuse procedure can be accessed from every Skyrock webpage and whenever user-generated content appears. According to the self-declaration, the reporting procedure was tested on all age groups to make sure it was easily accessible, understandable and age-appropriate. According to the provider user reports are handled promptly within 48 hours.

The self-declaration does not refer to if user reports are acknowledged or to how users are provided with the information they need to make an effective report.

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

Confirming the findings from the self-declaration, Skyrock provides users with an easy to use, age-appropriate and user-friendly mechanism to report inappropriate content or conduct on their site. On every blog, the user finds a button labelled “report content” (“signaler un abus”). This report form is also accessible at any time from the footer of every page. When clicking on the form, the user is asked to choose what he wants to report (“a blog, profile or group”, “a problem with the user account”). Then, the user is asked what kind of problem he/she wishes to report (“fake identity”, “photo stealing”, “porn”, “hatred, racism or insults”, etc.). The mechanism is quite simple and easy to use for children and the terms employed are simple. Only at one point during the reporting procedure “legal” terms are used (“Warning! Signalling a blog that does not violate the User General Conditions is not recommended. Reminder: if your request is shown to be unjustified, we have a legal right to forward it to the authorities”).

Reports are acknowledged immediately by email. During the test an offending picture of a minor (girl) and a sarcastic sentence were posted by another minor (boy) on his own blog. The girl concerned by the picture and the offensive message reported the boy’s blog (using the “report this blog” button). It took only 2 minutes for Skyrock team to send an email saying that the content had been removed from the site and to actually remove the offending content from the blog.

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

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

Skyrock states that they have mechanisms in place to prioritise and process notifications from users. Categories such as inappropriate sexual behaviour, pornography, suicidal tendencies and run away are the highest in priority. The provider also claims that illegal content and behaviour are removed immediately from the site and saved for eventual police investigation.

Skyrock refers in their self-declaration to the fact that they cooperate with French relevant law enforcement bodies and that “*extremely inappropriate contents or behaviour such as paedo-criminality, racial hate, inciting or advocating crimes against humanity are reported to the French interior Minister centralized platform (PHAROS).*” Even though Skyrock claims to cooperate with relevant law enforcement bodies, the self-declaration does not mention if they include relevant links on its website to other local agencies or organizations in order to support the process of reporting illegal content or conduct.

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

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

According to the provider, Skyrock provides relevant, easy-to-understand, contextual warnings to users regarding their online privacy. It also provides safety tips for minors including how to manage their online images. The self-declaration further states that a range of privacy setting options are accessible and prominent at all times.

The service provider further states that “*Skyrock asks very basic private information when registering and lets users decide which kind of information they want to display on their profile or blog.*” Skyrock also points out that it allows users “*to choose with whom they want to interact: everyone, members only, friends only, best friends only or nobody.*”

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

The main privacy setting option available to users is that they can turn some or all of their articles of their blog to secret. This option is always available via the user account. By doing this, all the secret content becomes only accessible to pre-approved “VIP” friends. It is easy for children to understand how this feature works. On the privacy settings page of the blog, there is easy to understand contextual information explaining how to use the “secret blog” option. Other privacy options include the possibility to restrict interactions among users, for instance by setting one’s account up so that the minor can only interact with specific users or with nobody (e.g. registered users, friends, only members of one’s VIP list, nobody, etc.)

In Skyrock’s profiles, optional personal information (e.g. home address, favourite music, etc.) is not required in order to sign up, but may be added to one’s profile if the user wishes to do so. If a user decides to add extra personal information, this information is automatically mapped onto the user’s profile. However, users are not explicitly informed of this automatic mapping of information and, therefore, they are not made aware that this information will be made visible to users beyond their approved list of contacts. For instance, if a user chooses to add information on his/her favourite music, there is no way to set this information to private: information is missing or it is public. Consequently, the user cannot choose what specific pieces of information to make private or public.

In order to deactivate their blog and profile, users have to go the “My account” (“mon compte”) page, accessible from the top of every page on Skyrock. The delete option is at the bottom of that page, in the right menu, not in the main part of the page. Users can delete their blog, their profile or their account itself. When they choose these options, they are warned that all information will be lost (including comments, pictures...). The process is simple: users only have to enter their password and a security code.

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

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

Skyrock maintains that they employ automated mechanisms and human moderators to review the content uploaded to the platform: Apart from a high precision image analyzer algorithm employed to review all the images uploaded to Skyrock, there are also moderators who manually review all the pictures and videos uploaded to the platform. As stated by Skyrock, all the moderators employed by the provider are older than 18 year olds; they are experienced and trained, and their backgrounds are checked when they are hired.

Skyrock claims to have mechanisms in place to prioritise and process notifications from users. Categories such as inappropriate sexual behaviour, pornography, suicidal tendencies and run away are the highest in priority. According to the self-declaration; users can also flag illegal content.

## **Summary of Results and Conclusions**

On the website, Principles 1 and 4 were evaluated as “*very satisfactory*” and Principles 2, 3 and 6 as “*rather satisfactory*”. Some areas of attention include:

- Even though the minimum age requirement to create an account on Skyrock is 12, a (fake) 9-year-old child created for this test could create a profile on the site. This finding suggests some deficiencies in the flagging system and the active manual searching of underage users referred to in the self-declaration as these mechanisms proved not to be effective enough in identifying and deleting an underage user from Skyrock<sup>2</sup>, at least during the period that the testing lasted.
- By default, any user, including minors, can be contacted by other users, including adults. Indeed, during the tests, one of the minors created for the testing was contacted by a young adult. Users, though, have the option to restrict interaction with other users if they wish so. Privacy settings are limited (thus simple to understand) and they do not offer users the possibility of deciding which specific pieces of information to share with which users.
- If a user decides to add extra personal information (not required during registration) to their Skyrock profile, this information is automatically mapped onto the user's profile. However, users are not explicitly informed of this automatic mapping of information and, therefore, they are not made aware that this information will be made visible to users beyond their approved list of contacts.

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<sup>2</sup> According to the provider an account that is flagged as “suspicious” will be removed by the moderation team if it appears that the user is really underage.

### 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	

