

IMPLEMENTATION OF THE SAFER SOCIAL NETWORKING PRINCIPLES FOR THE EU STARDOLL

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Introduction

Stardoll is the world's leading group virtual entertainment environment devoted to young women and girls. Described as a social gaming destination with a focus on fame, fashion and friends, Stardoll is based in Sweden with offices in the US, UK and Germany. Intended primarily though not exclusively for girls aged 7 – 17, the site itself evolved from an earlier website called Paperdoll Heaven. It was relaunched in 2006 and now has over 100 million registered users.¹ The site emphasizes letting girls express themselves through designing and purchasing clothes for their paper doll-like avatars. At Stardoll, users create their own MeDoll, a paper doll-like avatar, or choose from a selection of celebrity dolls and dress them up from the wide selection of fashions available. According to the provider 'Stardoll is one of few places on the Internet developed with an emphasis on girls' self-expression through fantasy and fashion play'.

Stardoll generates revenue through sale of virtual currency and the sale of advertising. It also monetizes through brand promotions that often feature branded virtual goods and in-world locations. Stardoll is growing at a rate of roughly one million new members every week. The site is now available in 21 languages; with its largest market the United States accounting for around a quarter of its overall user base.²

Summary of main findings

This report summarises the main findings of the tests carried out on Stardoll in the period between June 21 and June 24, 2011. Testing was carried on the various social networking features of the site using a number of accounts set up for the purpose. Membership of the site is free. However, a subscription for Community membership is required for features such as using message services, create a friends list, and access other members' guestbooks. Paid memberships were set up for four accounts, three for minors and one adult account. Safety appears to be well supported across this virtual entertainment environment. Safety information is prominently displayed and the Stardoll's One-Stop Rules provide a handy, easy to understand reminder of the code of conduct for the website. Mechanisms for reporting violations are readily accessible across the website with an easily identifiable red exclamation mark acting as a report abuse button. Blocking mechanisms are also prominent in the forum, messaging and comment areas of the site. Parents are provided with some important tools for safety protection for younger children. Parental consent is required for anyone registering under the age of 13 and by default a Kid Safe account is set up which blocks any online interaction. Parents can also cancel a Kid Safe, under 13s account at any time. For other members, private communication is limited to friends only. Profiles do not contain any identifying information. Only usernames appear on profiles and members are reminded throughout the site about not including any personal information in their profile or in online communication. Some content contained within profiles is public by default. A user's guestbook, personalised album and blog entries are public. The country of origin, age and gender of the member are also public by default. Each of these may be hidden while guestbook and blog entries may also be restricted to private or friends only. Forums and party channels (chatrooms) are by their nature public and require greater vigilance on the part of children and their parents. Tests were undertaken in situations where young people might be vulnerable, for instance, in a chatroom or in approaches made by strangers through a friend request. While it is possible for a minor to be contacted in this way, the moderation of the forum/chatroom was effective and blocking of communications proved successful. In addition, as already mentioned, communications are blocked for under 13 year olds with a Kid Safe account and therefore they will not be able to interact with anyone.

Analysis of Results by Principle

¹ Ashby, A. 'Stardoll turns 5, serves over 100m users'. *EngageDigital*, April 6. Retrieved from: <http://www.engagedigital.com/blog/2011/04/06/stardoll-turns-5-serves-over-100m-users/>

² 'Stardoll Reaches 100 Million Members Worldwide'. Retrieved from: <http://www.prnewswire.com>. April 7, 2011

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

Stardoll claims to educate and communicate with minors and their parents on how to navigate their website safely in an age-appropriate manner that is easy to access and understand. In order to do this, they claim to provide specific targeted materials such as a parent information guide (including “family rules”), privacy policy or kids privacy policy. However, no specific materials for educators are mentioned in the self-declaration, although external links to safety awareness institutions such as safekids.com are provided.

The signatory claims to provide clear information about what constitutes inappropriate behaviour on their service via the Stardoll code of conduct called “One Stop Rules”. These include: swearing, using sexually graphic language, being racist, bullying other members, asking for personal information (including photos), etc. This information must be accepted and users must commit themselves to comply with these rules when they become members of Stardoll.

Regarding the consequences of violating the Terms, the provider claims that depending on the severity of the violation users can either receive a warning and be closely monitored or their account can be deleted immediately. In more serious cases involving criminal offences Stardoll will contact the Swedish IT crime unit who will help coordinate with relevant law enforcement agencies worldwide.

Main findings in relation to the website

Safety awareness and online safety education is a prominent feature on Stardoll’s website. Parents and young people will find readily available safety and education resources in the Help section of the website accessible from the bottom of each page. A special section, called Parent Information, provides information about Stardoll and what it offers for parents who may be new to the service. It describes the safety measures available, including the restricted-feature Kid Safe membership facility. This is the default type of membership for users under the age of 13 and blocks online interaction. They may be upgraded to regular membership with parental consent. An Online Security Guide for Parents is also available which sets out guidance on safe internet use, rules and guidance about disclosure of personal information, and information about parental controls or filters. The site itself does not have a section for educators but includes referrals to a limited number of external resources specifically dedicated to family online safety and education. The information available for children is also located in the Help section and contains a series of short articles on safety and security issues. Written in easy to follow language and presented in brief question and answer articles, the safety information is accessible and user friendly for children. Some of the topics included of particular interest to young people focus on what to do if an account has been hacked, how to report bad behaviour, rules about images and etiquette online. A search facility is available in the Help section and topics are organised in visually accessible categories suitable for younger children.

The Membership Terms to which all users are required to agree on first registration are available at the bottom of each webpage. It is a long statement and presented in a way that would be off-putting for most young people. It does contain a heading ‘Special Information for Parents’, the primary audience, and presents information about moderation and safety on the site, account set up procedures, and essential information on personal data and privacy. Stardoll’s One Stop Rules, accessed from the Membership Terms, and prominent across the website, is a short, child-friendly code of conduct which sets out expected standards of behaviour and what is prohibited on the site. The frequent reference to the One Stop Rules in help articles and in such actions as blocking users for code violation is a helpful way of reinforcing good conduct and safe online practices.

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

Main findings in relation to the self-declaration

In its self-declaration Stardoll states that no minimum registration age applies, but users younger than 13 need parental consent via e-mail to join the site and are suggested to sign up for a Kid Safe account that does not allow them to communicate with other members of the community. By means of this mechanism, the parent/carer can at any time cancel their child’s membership at Stardoll.

Regarding the mechanisms through which the service provider ensures limited exposure to potentially inappropriate content and contact for children, the provider claims not to host any “adult” content and not to have any specific sections for adults only. In addition, Stardoll states that they have several mechanisms in place to ensure that minors are not confronted with inappropriate content. These include, among others: the personal

information provided by users at registration is not visible for other members; users are not allowed to upload pictures of themselves or of other people and all images are pre-moderated before appearing on the site; users can also block other members from sending messages or visiting their page. The provider further claims to moderate the site and the interaction among its members; text filters are applied to detect inappropriate language, racist or sexual content and ads at Stardoll must be age-appropriate and adequate for children. According to the self-declaration, Stardoll applies a special policy for advertising targeted at children on their website. The policy refers to the types of advertising that are allowed/forbidden on the website (e.g. alcohol and tobacco ads are forbidden) and to the importance of taking into consideration children's vulnerability when advertising any product on the website.

Main findings in relation to the website

There is no minimum age requirement for registration on Stardoll. A child seeking to register needs to enter name and date of birth. When registering on the site, those under 13 automatically get a special category of membership, called Kid Safe that blocks communication with other users of the site. Parental consent is required to approve a Community membership of the site for all children under the age of 13. In a test registration for the service, an email was sent to the address entered for the parent, notifying them of the account set up. Parents are also informed that they may cancel membership of a child's account at any time. According to Stardoll, 'adult' content is not hosted on the site and as such there are no separate categories or sections for adult content. In testing, this was confirmed and content viewable was appropriate for all age groups. Users, for instance, are not allowed to upload pictures of themselves or of other people and all images are pre-moderated before appearing on the site. Online communication is also moderated both through the use of text filtering and by Stardoll staff. In an experiment set up for the test, accounts were set up for an adult (male, 25 years) and a minor (female, 15). The adult account was set up specifically to seek contact information from a minor. It was possible for the adult account holder to make contact with the minor in a Stardoll-hosted chatroom, but divulging personal information such as name of school attended and telephone number was blocked. Text filtering was also successfully applied when racist comments or inappropriate language was posted in comments on some of the sample accounts set up. Stardoll also operate a strict advertising policy in relation to any paid advertisements that appear on the website. According to its self declaration, direct, action driven commercial messages targeted at children are not allowed. None were observed over the course of the test.

Principle 3: Empower users through tools and technology

Main findings in relation to the self-declaration

Regarding the tools and technologies employed to assist children and young people in managing their experience on the service, particularly with regards to inappropriate or unwanted content or conduct, the self-declaration states that only limited identifying personal information (first name, date of birth and e-mail address) is required of users at registration. This information is not visible to other members. Moreover, as mentioned under Principle 2, Stardoll emphasizes that users are not allowed to use their first name in their profile, but they must create a nickname. Age, country and gender would, by default, be visible to other users, but can be made invisible. Stardoll claims that users are not allowed to upload real pictures on the site and that private messages can only be sent to accepted friends. Members can block other users from sending them messages or from visiting their page and they have the option to delete entries in their guest book.

Main findings in relation to the website

A range of tools and technologies are provided by Stardoll to ensure safety of children and young people on the site. Kid Safe membership does not allow under 13 year old users to access any of the communication functions of the site. Online interaction for all members is moderated and tools are available to block unwanted messages and to report users and/or violations of the code of conduct, Stardoll's One Stop Rules. Users are advised not to include any personal information on their profiles. On registration, users enter a user name, a date of birth and select an avatar (which also defines gender). From this, age, gender and country of origin are automatically entered on their profile. Users may then complete a free text 'About Me' presentation located on their individual profile page. Profiles of minors are not searchable on the service or through external search engines. By default, all profiles, including the profiles of minors, are visible to all users, even those beyond the approved friends' list. A public version of the profile which contains the username and avatar but no personal information, is visible to non-registered users but only if they have the URL. A link to this public profile is placed on the user's home page allowing them, for instance, to share it with non-users of the site. Within the Stardoll virtual environment, profiles, which may include any (identifying and/or non-identifying) information entered by the user in the 'About Me' presentation, are visible to all registered users. Each profile also contains a guestbook in which

visitors can enter comments. Users can also maintain a blog as part of their profile to which others may add comments. An option is available in privacy settings to restrict the guestbook and blog to friends only, to pre-moderate comments or to keep it completely private. It is also possible to hide a user's gender or age on their profile. By default these are displayed. Only friends may send private messages and use the chat function. All users may send friend requests and also have the ability to block other users.

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 users can report content to the Stardoll moderators and/or they can delete content themselves (e.g. an entry in a user's own guest book). Members can also block other users from future contact. Stardoll provides abuse reporting tools wherever there is textual user-generated content (e.g. chat, guestbook messages, text presentations, etc.). The self-declaration states that the reports are dealt with within 48 hours. The consequences of the reporting vary depending on the severity of the violation. For instance, a reported user may simply receive a warning or in more serious cases, they may be expelled from the site and their member account could be deleted. No information on if users are provided with an indication if their reports are acknowledged nor information on how reports are typically handled was found in the self-declaration.

Main findings in relation to the website

Mechanisms to report violations of Stardoll's code of conduct, its One Stop Rules, are available in all locations where there is user-generated content and where a user may be subject to harassment or abuse from other members of the service. A report flag – the red exclamation mark placed within communications function in the message service – is available in the chat message box and in the comments areas. Clicking the report flag provides the user with an option to block the sender and/or to continue with a report about the violation. Information about reporting code violations is available in the Help section. Users are reminded when filing a complaint that false reports or abusing the report function may result in termination of an account. Testing this function involved submitting a report about offensive comments posted to a blog entry on the account of a minor (not a real account). The process of submitting a complaint was easy to follow and no difficulties were experienced. In reporting, the user was offered the option block the offender in the first instance and/or continue with submitting a complaint. The information requested was specific and offered a set of straightforward options regarding the object in question (a private message, a comment) and the nature of the abuse (offensive language etc.). Confirmation was given that all complaints are treated seriously and acted upon within one day. The sender was also informed that they would not be contacted about the complaint unless further information is received. Possible actions include removing of the offending content, and warnings or termination of the subject of the complaint. In this case, the offending content was removed. No further communication was received nor did the creator of the offending comments receive a warning.³ Members may also use the 'Contact Us' at the bottom of the each page to submit a report of a more general nature.

Principle 5: Respond to notifications of illegal content or conduct

Main findings in relation to the self-declaration

The provider states in its self-declaration that if users slightly violate Stardoll One-Stop-Rules, the member in question will receive a warning and will be closely monitored by Stardoll staff by means of an "internal warning list of reported members". If the violation is severe, "the reported account will be deleted immediately". If required, further details regarding the reasons for deleting the account, may be sent to the reported user and further investigated by Stardoll customer service staff. Stardoll claims to count with trained customer service staff and moderators who elaborate appropriate responses to reports and flags. According to the provider, members of Stardoll staff and moderators "regularly meet to calibrate and discuss children's behaviour and the necessary actions to be taken".

The self-declaration mentions that user's reports are dealt with within 48 hours and in case of severe violations the reported account will be deleted immediately. Depending on the severity of the violation users can either

³ According to Stardoll, the submission of a first report might not result in a warning. However, several reports will result in a warning being issued or in deletion of the offender's account

receive a warning and be closely monitored or their account can be deleted immediately. In more serious cases involving criminal offences the Swedish IT crime unit is contacted to help coordinate with law enforcement agencies worldwide.

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

Main findings in relation to the self-declaration

Stardoll claims that keeping the identities of their members protected is a “high priority”. Indeed, Stardoll emphasizes that they do “not accept any identifying information being exchanged between its members and such information is taken off the site. Members also run the risk of being expelled from the site in cases where they post such information”. In addition, the provider claims that no personal data from its members is transferred to third parties. As stated under Principle 3 and in the self-declaration, Stardoll has taken several measures that can minimize the risk of profiles of minors being found online, for instance only limited identifying personal information (not visible for other members) is provided by users at registration and users are not allowed to use their first name in their profile.

The self-declaration states that users of this SNS are provided with a range of privacy setting options including, among others, the possibility for users to make certain information from their profile invisible to other users, the option to block other members from sending them messages or viewing content in their pages. The provider also states that users are warned not to give out any identifying information on the site. This is done via the Kids privacy policy and through the Online Security Guide.

Main findings in relation to the website

In general, profiles are accessible only to registered users within the Stardoll environment. Users are informed when they first set up an account and reminded in help articles about never giving out personal information such as real name, address, email, or telephone number. Some automatic mapping of information collected on registration takes place and a user’s profile displays by default age, gender and country of origin. The profile template does not contain fields for personal information and only a username, age and gender are visible. A text box called ‘About Me’, in which one can enter descriptive information, is available on the profile page and is visible by default to all registered users. Users are advised but not prevented from entering personal information. In the tests undertaken, for instance, personal information including name, age and city of location were entered into the ‘About Me’ description and these details were available to all registered users of the site. These findings suggest that even though Stardoll does “not accept any identifying information being exchanged between its members”, it is possible for users to exchange or share identifying information with all other registered users of the site by adding information to the “About me” section. Other personalisation of the user’s profile does not involve any potentially identifying information and is achieved through creative design, using the tools supplied for creating an avatar and stylising its environment. Privacy settings, accessible from the My Account tab, allow for control of visibility of information displayed. Here it is possible to hide details such as country of origin, gender and age, which are made visible by default. User content such as the profile guestbook and blog are again by default open to all to post, but may be made completely private or restricted to friends only. Only friends can see the online status of users through the chat function and only friends are able to send private messages. It is not possible to restrict a full profile to either ‘friends only’ or to nominated friends. Some information and functions may be restricted but all other aspects of a user’s profile remain visible to all and for this reason ensuring that profiles do not contain any personal information is essential. Deleting a user’s account is easily achieved. A link is provided in the help section which deletes the account. Information is provided in the Membership Terms in the section on Personal Data and Privacy Policy on data retention as prescribed by applicable law. This is intended primarily for parents and younger users would have difficulty understanding its meaning.

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

Main findings in relation to the self-declaration

In order to identify and review prohibited or illegal content or conduct, Stardoll claims to operate extensive moderation (via the trained customer service staff) on the site and also to employ automated tools, such as filtering tools for inappropriate language, racist or sexual content.

Even though the self-declaration indicates that “the customer service staff and moderators are trained in appropriate responses to reports and flags”, it is not clear from the self-declaration if staff are in real-time contact with children or young people. In case they were, no information is provided in the self-declaration regarding the steps taken by Stardoll to minimize the risk of employing candidates who may be unsuited for work which involves real-time contact with children or young people.

Summary of Results and Conclusions

On the website, Principles 1, 2, 3 and 4 were assessed as very satisfactorily implemented. Principle 6 was assessed as rather satisfactory. The main strengths of this SNS are that safety information is prominently displayed and the Stardoll’s One-Stop Rules provide a handy, easy to understand reminder of the code of conduct for the website. Mechanisms for reporting violations are readily accessible across the website with an easily identifiable red exclamation mark acting as a report abuse button. Blocking mechanisms are also prominent in the forum, messaging and comment areas of the site. Other positive aspects include the fact that online communication is moderated both through the use of text filtering and by Stardoll staff. In addition, profiles of minors are not searchable on the service or through external search engines. Finally, privacy settings, accessible from the My Account tab, allows for control of visibility of information displayed while deletion of an account is easy to accomplish.

Some areas of attention include:

- Even though the self-declaration states that Stardoll “does not accept any identifying information being exchanged between its members”, it is possible for users to share identifying information with all other registered users of the site by adding information to the “About me” section. In other words, any (identifying and/or non-identifying) information entered by the user in the ‘About Me’ presentation is visible to all registered users.
- Users can't restrict a profile to friends only.
- It is possible for a minor to be contacted via the forum/chatroom, but the moderation of the platform was effective and blocking of communications proved successful.
- All users may send friend requests, but only friends may send private messages and use the chat function.

Assessment of the Principles in the Self-declaration

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

Implementation of the Self-declaration on the SNS website

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

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