

# IMPLEMENTATION OF THE SAFER SOCIAL NETWORKING PRINCIPLES FOR THE EU YAHOO! FLICKR

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## Introduction

Yahoo! Flickr is an online platform which allows users to post and share video and images. It was launched in 2004, and is available internationally in 10 languages including English, Chinese, German and French. In 2010 it was reported that Flickr was hosting more than 5 billion images<sup>1</sup>, though no specific data on current numbers of registered users could be found. It has a wide demographic base of users including minors and has a minimum registration age of 13. The service offers free and pro accounts, and provides social networking and community building tools. It also enables the creation of personalised profile pages containing information about users, and allows the development of contact lists of users. It has a variety of privacy settings which can determine access to content, and provides extensive safety information to users, both adults and minors.

## Summary of main findings

Flickr has been successful in implementing the principles and safety measures described in their self-declaration. The service provides accessible and age-appropriate safety information for children and young people. Although the Terms of Service provided are framed in legal language, the Community Guidelines and FAQs provide this information in age appropriate language, including the types of behaviours which violate these terms and potential consequences. The main strength of the SNS in relation to Principle 2 is the use of Yahoo! ID to check the age of users and ensure compliance with age requirements. A child below 13 cannot change their Yahoo! ID to place their date of birth above the minimum age requirement for Flickr. However, as no 100% reliable age-verification mechanism exists up to date, there is no way to prevent a determined user registering another Yahoo! ID with the appropriate age, and then using this to sign into the service. Young people cannot be identified by adults using internal searches. Access to the profiles of minors is only possible if adults are on the associated contact list or if they are friends-of-friends, though the photos of all users are visible in searches, and can be commented on by all registered users by default. The amount of personal information required in the profile page is minimal, and minors are able to use the associated settings to determine accessibility of those details. Clear and accessible information about the risks associated with disclosure of personal information on Flickr is provided in the Community Guidelines. The privacy settings are accessible and easy to use for young people, and provide the ability to distinguish between different groups of users in managing access to content, etc. The reporting mechanisms provided by the service are also accessible and easy to use. The use of filtering and monitoring tools in the service to prevent young people from accessing inappropriate pictures is effective, and the response to reports of incorrect labelling was dealt with promptly in a manner consistent with the Community Guidelines.

## 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 claims to provide prominent safety guidance (common to different services which share similar features) in “central locations on the Yahoo! Portal (and outside the Terms of service)” (e.g. the Yahoo! Help Central linked from the Help home page and in dedicated safety pages aimed at parents and children via Yahoo! Safety) including safety information specifically targeted at parents and carers (e.g. teachers), as well as specific guidance for children and young users. The self-declaration also states that the Yahoo! Privacy Policy offers users specific information on topics such as privacy and “the posting of information and content on user generated services”.

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<sup>1</sup> Source: <http://blog.flickr.net/en/2010/09/19/5000000000/> (accessed 16.05.11).

The provider states that the general Yahoo! Terms of Service establish the general conditions of use for all Yahoo! Services including Flickr. Here, the consequences of breaching the terms of service are specified. Additionally, according to the provider, the Community Guidelines “set out standards of behaviour for community-based services” which are supplemented with additional guidelines for Flickr explaining the do’s and don’ts for users. According to the provider, this information is not only easy to understand for children and young users, but is also easily available via the footer of every page on Flickr. Relevant links to this information are provided in the self-declaration.

According to the provider, “Flickr does not provide tools which allow parents to control their children’s accounts”. However, Yahoo! claims to provide relevant information to parents about other tools outside Yahoo! (e.g. parental controls) which can be used to supplement the safety features provided by Yahoo!

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

Flickr provides clear, accessible and targeted safety information for young people, adult users and parents in the Community Guidelines and FAQs. There is also a wide range of information available on Yahoo! Safely which can also be accessed from the homepage of Flickr. This is a general online safety resource which has sections for parents, young people, general tips and product specific safety guides. It covers general issues of online safety, as well as safe use of specific Yahoo! services including Flickr. The section of the site for young people contains information on a wide variety of topics (e.g., cyberbullying, sexting etc.), and an archive of relevant safety videos. This includes links to a number of external sources of information for young people, parents / carers and teachers. There is a direct link to Yahoo! Safely from the homepage of Flickr, as well as through the Community Guidelines which can also be accessed from the homepage. Users do not need to be registered with Flickr to access these sources of information, enabling potential users and parents to find out more about the service without being a member or prior to registering.

The Terms of Service for Flickr are generic to all Yahoo! products and services, and can be accessed from the bottom of the homepage (where links to the Privacy Policy, Report Abuse link etc. are located). These are presented in a standard legal format with text formatted in separate, generally short paragraphs. It is a generic document which is not specifically targeted at children and young people. The text is framed in legal terms, and the included descriptions of behaviours which constitute violations (e.g., ‘ethnically or otherwise objectionable comments’) may not be sufficiently clear to young people. However, the main issues relating to inappropriate use of the service and associated violations (e.g., bullying, hate speech, posting violent or sexual content) are described in accessible and age-appropriate language within the Community Guidelines and FAQs. The consequences of violating the Terms of Service are also clearly described in these pages and include deletion of images, moderation of accounts, warnings and account deletion. The main strength of the SNS in relation to Principle 1 is the accessible and age-appropriate nature of safety information for young people and parents.

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

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

The self-declaration states that the minimum age required to subscribe to Flickr is 13 and that technical blocks are in place to prevent users younger than 13 from obtaining a Flickr account. “Where a young user is found to have lied about their age and breached Yahoo! Terms of service, customer care will delete their Flickr Account and associated Yahoo! ID.” The self-declaration refers to a number of measures in place to protect young users from inappropriate content and contact. These include requiring users and content partners to tag their content as “safe”, “moderate” or “restricted” (in line with Flickr guidelines) which correspond to the safe search settings “off”, “moderate” and “on”. As stated by the provider, this mechanism, would allow the restriction of user-generated content to minors. The content provider also claims to have the safe search option “on” by default for all users and that “logged-in users who have a registered age of 13-17 years cannot turn safe search to “off”. In other words, users registered as 13-17 years old cannot view content tagged as “restricted””. According to the self-declaration, users aged 13-17 can; however, change their settings to allow access to content tagged as “moderate”. Moderate content includes nudity, but only in

an artistic context. “Content more explicit than this is wrongly tagged and users are encouraged to report this to Flickr’s customer care team”.

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

Flickr has a minimum age of 13 for users, though the evaluator could not identify any specific mention of this in the Community Guidelines<sup>2</sup>. To sign into Flickr, users must have a valid Yahoo! ID account (or can use Facebook or Google). Signing up for a Yahoo! ID requires the user to provide their name, gender, country, postcode and date of birth. This process generates an email address, username and password which can be used to sign up for other Yahoo! services including Flickr. These details are checked during the Flickr registration process, and users aged below 13 are not permitted to access or use the site. A child below 13 cannot change their Yahoo! ID to place their date of birth above the minimum age requirement for Flickr. However, as no 100% reliable age-verification mechanism exists up to date, there are no technical mechanisms to prevent a child registering another Yahoo! ID with the appropriate age, and then using this to sign into Flickr.

The service does not provide parental controls, but uses a system of classifying and filtering content to ensure that minors are prevented from accessing inappropriate pictures or videos. Information about this labelling/filtering mechanism is included in the Community Guidelines and FAQs, as well as the Flickr Safety Guide. Yahoo! Safely also provides parents with general information on different tools for increasing the safety of their children online. Content is rated by users as ‘safe’, ‘moderate’ or ‘restricted’. Minors by default are restricted to access only ‘safe’ content, though this setting can be changed to allow access to that which is labelled as ‘moderate’. A series of image searches were conducted with safesearch enabled (default for minors) using terms which could expose minors to inappropriate content (e.g. sex, violence, nudity, drugs, gore, porn), but they generally did not lead to problematic photos. There were some nude images which would be classified as artistic, as well as some photos of drug paraphernalia (e.g. things for smoking marijuana), but no pictures of drug taking as such. Tests also confirmed that minors are able to change the safesearch setting to enable access to moderate content (“safesearch moderate”) using the privacy settings, though they cannot be changed to allow access to restricted content. Changing the default setting to ‘moderate’ provided access to some “inappropriate” images, including an image of a man with his genitals on display. According to the self-declaration, ‘moderate’ content includes nudity, but only in an artistic context, which was clearly not the case of some of the content found on the site. However, the provider argues in its self-declaration that “content more explicit than this is wrongly tagged and users are encouraged to report this to Flickr’s customer care team”. During testing, one image which contained pornographic material within the photo on a computer screen was identified. This image was reported to Flickr’s customer care team and was, indeed, reclassified as described in relation to Principle 4.

The main strength of the SNS in relation to Principle 2 is the use of Yahoo! ID) to ensure compliance with age requirements. However, as no fully reliable age verification mechanisms exists up to date, it is not possible to prevent users aged below 13 creating an additional Yahoo! ID with an amended date of birth to register with the site. A less positive aspect regarding Principle 2 is the fact that registered; logged-in, minors have the opportunity to change the safe search settings to enable access to content tagged as “moderate” which, as tests demonstrated, can be inappropriately tagged in some cases. Nevertheless, testing also demonstrated that when inappropriate content is reported, the provider efficiently deals with it so that it is no longer available for minors).

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<sup>2</sup> This has changed since testing, and this information is now stated in the FAQ’s.

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

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

The provider claims to employ a number of tools and technologies to assist children and young people in managing their experience on their service, particularly with regards to inappropriate or unwanted content or conduct. These include, among others, that profiles of users 13-17 are not searchable and users may create an online identity or nickname and use it instead of their real name. As stated by the provider, “Flickr profiles are not full profiles” (only the e-mail address is necessary to create one), still profiles in Flickr are “public by default” because they are believed to constitute a low risk to minors. The provider claims that, if they wish, users can create a profile page where they can share more information about themselves and their interests. They can also share their web URL or blog link but this is not required. According to the provider, “a profile is not the main entry point to Flickr for a user, i.e.: a user would typically visit a photostream and, if he chooses to, could visit the profile also, if they wanted more information.”

The self-declaration also states that all users can block, ignore or delete users from their contact lists, they can also reject invitations and they can control who can see specific elements of their profiles and apply specific access control to each of their pictures (e.g. users can prevent others from viewing or commenting on their photos). According to the provider, users can also organize their contacts into “friends”, “family”, or “friends and family”, or just “contacts” (who do not have the special privileges that friends or family have).

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

The profiles of users below the age of 18 are not searchable via external search engines or internally within Flickr, even if the username is known, as this is prevented by default. Minors are also unable to change the associated settings to make their profiles searchable. However, their images are included in photo searches unless disabled through the privacy settings. By default, the visible personal information in the profile page of minors contains the username, gender, relationship status, likes and dislikes, and photostream. Gender and relationship status are not required information, and users have the option to choose a ‘prefer not to say option’ in response to these questions. Adding likes and dislikes information is also optional. These options limit the amount of personal information contained in profiles, but there are options for all users to add more detail about themselves. There is no pre-moderation facility for comments before they are published, but they can be deleted by the user.

Access to the different types of information of minors varies according to whether the user is a registered user, a “friend of a friend” or a contact. All registered users are able to make comments on the publicly accessible photos of minors by default, though only contacts can add tags or people. Photos identified in searches can provide access to the username of minors, as well as their gender and relationship status, likes and dislikes, and their photostream. It also provides an opportunity to send them Flickr mail and update (friend) requests, though the age and the contacts list are not visible. Adult users can also access the profile page of younger users and the same information as previously described if they are “friends of friends”. Contacts also have access to this information, as well as the birthday, the email address of the user if made available, and the contacts list. Younger users can build up contact lists of both adults and minors, though contacts can also be blocked and deleted. The main difference between friends of friends and other registered, but not “connected” users lies not in the type of personal information (from the minor) they can access, which is the same in both cases, but rather in the ways to get access to such information. A friend of friend is automatically granted access to this information while other registered, non-connected users, can only have access to such information via the photostream of the minor.

The strengths of this SNS in relation to Principle 3 are that young people cannot be identified by adults using external nor internal searches. Users can only find a minor’s profile if they know their photos (via the photostream) or their ID or URL. As stated in the self-declaration profiles are not the primary entry point, rather the content is so the risk of a minor’s profile being found like this is rather limited. Still, if the profile is found, minors could eventually be contacted by users beyond their approved list of contacts (e.g. via Flickr mail or by commenting on their photos). It must be noted, though, that even if a profile is found, users have control over the accessibility of the personal details contained in their profile and mandatory data field is limited (e.g. the minor’s age would not be revealed to users beyond their approved list of contacts).

## ***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 provider claims to provide easily accessible mechanisms to report inappropriate content, contact or behaviour on their website via a link to a “report abuse” form on the “permanent and prominent” footer on every page on Flickr. Besides, the provider claims to have in place a prominent “flag this photo” link next to every image on Flickr. According to the provider, “the report abuse form is easy to understand by all users, including children”. The provider also states that reports are acted upon expeditiously, typically within a time-frame of 48 hours, although complex cases may need more time to be resolved. According to the provider, users receive guidance on the information they need to provide with their report and/or on what they can do to resolve the matter themselves. Finally, when they send a report they receive an on-screen or e-mail notification.

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

Flickr provides one central reporting mechanism, as well as different ways to block users. There is extensive information in the Community Guidelines, FAQs and Flickr Safety Guide about reporting abusive behaviour, contact or content. The reporting mechanisms and related information are accessible for minors and easy to use. Information is provided on what happens to reports, and how users or content reported is subsequently dealt with. Each page of the site contains a link to a Report Abuse page which provides users with a list of potential problems (e.g., content which violates Terms of Use, inappropriate behaviour in groups) which can be reported and investigated. Users making a report are asked to select a specific problem and this either auto-generates related advice (e.g., on blocking users), generates a reporting form for content, or asks them to provide a brief description of the problem if they are reporting another user’s behaviour. This menu system was used to report a picture which contained sexually explicit material. This generated an automatic message stating that the report would be investigated by the moderators and action taken if necessary. It also explained that there would be no further contact from Flickr unless they required further information. The image was reflagged as restricted by Flickr within 24 hours and could not be accessed by minors, consistent with the timescale described in the self-declaration (48 hours). Individual pictures can also be flagged as inappropriate using the related icon included with each picture. This leads to a pop up window which specifies how the image has been tagged, the user’s search settings, and provides the option to classify the image as incorrectly flagged. The Community Guidelines state that Flickr can delete content, moderate accounts, send warnings or ultimately delete accounts for users who have been found to violate the Terms of Service. The main strength of the SNS in relation to Principle 4 is the accessibility of the reporting mechanisms, their ease of use and the accessibility of supporting information.

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

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

Yahoo! states that they have expeditious mechanisms in place to process notifications from users about content or conduct which breaches their terms of service and that reports of abuse are resolved in a timely manner. The self-declaration also refers to the arrangements Yahoo! has in place with relevant law enforcement agencies in Europe that include the handling of urgent matters within hours and the passing on of suspected illegal content or reports (e.g. in cases of grooming of minors) to relevant bodies. The self-declaration further indicates that Yahoo! supports the local hotline <sup>3</sup> in charge of handling reports related to images of child sexual abuse and that it provides links to such organizations in its Help Central page and Yahoo! Safely.

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

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

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<sup>3</sup> Yahoo! indicates that the local hotline in the UK is the Internet Watch Foundation and that Yahoo!’s membership status is confirmed on the IWF website at <http://www.iwf.org.uk/members>.

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

According to the self-declaration, users of Yahoo! Flickr are provided with a range of privacy setting options as well as with supporting information to help them make informed decisions about the information they post online via a permanent “Your Privacy” link at the foot of every page on Flickr. These settings can also be accessed by clicking on the username in the header of the page. Yahoo! claims to offer users a dedicated Privacy Centre with practical tips to manage user’s privacy and personal information. The provider also claims that “it is clear to users when completing their profile what content will be public”.

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

The privacy settings for Flickr are clearly available at all times through the account settings menu which is available under the ‘you’ tab on all pages. The settings enable users to control who has access to the profile page, contact lists, comments on photos, tags, etc. There are also options to change the privacy settings for individual photos and user blocking mechanisms which are accessible and easy to use for younger users. Supporting information is included on the specific page containing the privacy settings, and guidance about disclosing personal information on the site can also be found in the Community Guidelines, FAQs and Flickr Safety Guide. Default settings are provided by the service to prevent adults searching for the profiles of minors if they are not already contacts or friends of friends. The settings provide distinctions between contacts, friends and family, and can be used to allow or restrict access to certain activities (e.g., tagging, commenting on photos, etc.) for different users. Privacy settings also include the ability to block other users and contacts. This prevents access to the photostream or profile of the user who has blocked them, and use of the internal search function to locate them. The blocked user is also invisible to the person who instigated the block on the contact list of common friends. They do not receive a notification that this has occurred or an explanation why a contact / friend has disappeared from their contact list. Minors are able to use the search facility to find adults and contact them if they know the relevant username. They are then able to access the associated profile (if public) with full name, gender, relationship status (the associated default is also public). They can also access the profiles of users on the related contact list including other minors, and access any associated information included by default (e.g., gender, relationship status, likes and dislikes). The personal information required during registration is not automatically mapped onto the user profile. Other types of information can be added to the profile, but it is made clear that this information is not required by the service. Users are warned about disclosure of personal information and associated risks in the Community Guideline, FAQs and the Flickr Safety Guide. It is easy to delete an account on this service, and the associated information in the Account Settings makes it clear that all photos, videos and associated metadata is removed. The privacy settings are accessible and easy to use. They provide the ability to distinguish between different groups of users, and manage access to content and ability to engage in different activities accordingly.

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

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

The provider claims to assess their service to identify potential risks to children and young people via report abuse forms generated and by the flagging of inappropriate photos by users. According to the provider, customer care agents typically handle complaints about content or conduct which breaches the Terms of service. Besides, the self-declaration states that “serious abuse in a Yahoo! Service may be escalated internally to a dedicated team within the Legal group which provides professional support and advice on more complex matters and determines an appropriate response”.

The provider claims that the so-called community managers “engage with the community to promulgate and encourage respect for the standards of behavior set out in the community guidelines and the Yahoo! Terms of service”. These community managers also offer help to users via the Help Forum.

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

## **Summary of Results and Conclusions**

On the website, all the principles were assessed as very satisfactorily implemented (See Table 2). The main strengths of this SNS are the availability of targeted safety information for minors and carers as well as the user-friendliness and effectiveness of the reporting mechanisms available on the site. The privacy settings are also

accessible and easy to use and they provide the possibility for users to manage access to their personal content and the ability to engage in different activities accordingly. Some areas of attention include:

- Registered, logged-in, minors can change the safe search settings to enable access to “moderate” content which, as tests demonstrated, can be inappropriately tagged in some cases, thus potentially allowing access to some type of inappropriate content. Nevertheless, testing also demonstrated that when inappropriate content is reported, the provider efficiently deals with it so that it is no longer available for minors).
- As stated in the self-declaration profiles are not the primary entry point, rather the content is so the risk of a minor’s profile being found is rather limited. Still, if the profile is found, minors could eventually be contacted by users beyond their approved list of contacts (e.g. via Flickr mail or by commenting on their photos). It must be noted, though, that even if a profile is found, users have control over the accessibility of the personal details contained in their profile and mandatory data field is limited (e.g. the minor’s age would not be revealed to users beyond their approved list of contacts).
- “Friends of friends” and adults who identify minors through public photo searches have access to considerable personal information from younger users, namely, the username, gender, relationship status, likes and dislikes, and contacts list. Even though this information is not required by the service, if users choose to include it on their profiles, it becomes visible to friends of 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		

**Table 1. Assessment of the Principles in the self-declaration**

## 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		

Table 2. Implementation of the self-declaration on the website

