

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

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## Introduction

YouTube is a video-sharing website on which users can upload, share and view videos. Founded in 2005, YouTube displays a wide variety of user-generated video content, including movie clips, TV clips, and music videos, as well as amateur content such as video blogging and short original videos. Acquired by Google in 2006, YouTube is described as “the world’s most popular online video community,”<sup>1</sup> It has over 3 billion views per day and is the third most visited website globally.<sup>2</sup> YouTube is now localized in 25 countries across 43 languages. While most of the content on YouTube is uploaded by individuals, media corporations and other organizations also offer video content via the site, as part of the YouTube partnership programme. Unregistered users may watch videos, and registered users may upload an unlimited number of videos, comment on other videos and create personalised channels in which to present their own content. YouTube is intended for individuals of 13 and over. Videos that are considered to contain potentially offensive content are available only to registered users 18 years old and older.

## Summary of main findings

This report summarises the main findings of the tests carried on the YouTube website in the period from June 20, 2011 to June 24, 2011. A high commitment to safety on the part of YouTube was evident through the prominent way in which it is featured throughout its service. Safety information for parents, teachers and younger users is widely available and extensive resources including educational materials, safety tips and videos, help articles and a help forum are easily accessible to users. YouTube’s Community Guidelines provide the principal means by which users are informed about acceptable content and behaviour on the service. These are written in admirably clear and plain language and seek to promote a respectful and common sense approach to sharing video content. Users are invited to report violations of the terms of use by flagging content that may be considered in breach of the code or inappropriate for viewers below the age of 18. Tests performed in reporting inappropriate content were found to be very effective and prompt action was taken in restricting content unsuitable for minors. Privacy settings are readily accessible to users and allow making uploaded video content private or restricted to a named group of friends as appropriate. Information contained on one’s personal channel can be modified and hidden as required. The channel as a whole can be made invisible. However, there is no option to restrict its view to friends only or to discriminate between groups of friends. Once personal information is made visible, it may be viewed by all users, whether registered or unregistered.

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<sup>1</sup> Janet Wasko and Mary Erickson (2009) ‘The Political Economy of YouTube’ in The You Tube Reader’, Pelle Snickars Patrick Vonderau eds. Stockholm, National Library of Sweden.

<sup>2</sup> ‘Statistics’. Retrieved from: [http://www.youtube.com/t/press\\_statistics](http://www.youtube.com/t/press_statistics)

## 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*

In its self-declaration, YouTube states that they provide safety information targeted to parents, teachers and young people via two main channels: YouTube's dedicated Safety Centre and Google's Family Safety Centre. YouTube's dedicated safety centre provides users with tips such as keeping their personal videos private, protecting their online identity, managing interactions with other users on the platform, etc. It also provides videos focusing on how to stay safe online and in particular on YouTube. Google's Family Safety Centre provides additional safety tools and resources for children, teachers, parents and families (e.g. The possibility to prevent unwanted content via "SafeSearch"). The self-declaration also states that users can access the Community Guidelines, Help centre and Safety Tips from every YouTube page and that all these resources are "written in an easy to understand, user-friendly format". The self-declaration further states that YouTube has recently added the Educator and Parent Resources pages, specifically targeted at those audiences.

The signatory states that they provide clear information and guidelines ("in an easy-to-understand language") about what content is acceptable in their service and what is not. This information is made available to users via the Community Guidelines, which emphasize, for instance, that uploading inappropriate content such as hate speech, pornography, images of drug abuse, graphic violence, is forbidden. Also, predator behaviour, harassment, revealing other users' personal information, or any other activity that may endanger the safety or privacy of young users are prohibited on the site. Information about the consequences of inappropriate behaviour on the website are also mentioned in the self-declaration, for example, "users who repeatedly violate our policies will have their accounts terminated". The provider indicates that the Community Guidelines can be accessed from every YouTube page.

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

Safety considerations are very evident across YouTube's services. The YouTube Community Guidelines – the code of conduct for using the service – as well as safety tips and access to the Help Centre are available from each page of the website. New users will find easily accessible information from the welcome page and in a series of short articles in the link called About YouTube. The YouTube Community guidelines, its code of conduct, provide a comprehensive list of prohibited content. The main areas of risk are highlighted on the YouTube Safety Centre. Users choose from a checklist of different risk areas and are provided with targeted, country-specific information. Safety information is presented in plain language and in a user-friendly format. It is easy to find and users will have little difficulty in following the instructions and information given. Resources for parents and teachers are prominently displayed in the Safety Center, again accessible from every page of the site. Parental guidance includes an easy to follow Frequently Asked Questions (FAQs) section, short tips on ensuring safety for children on YouTube, and a series of short videos on safer technology use, how to deal with cyber bullying, and implementing safety features of the service. Educator resources include further details of safety features, guidelines of flagging potentially inappropriate content, and more detailed discussion of privacy and harassment issues. A series of Help articles and a Help forum is available via the Safety link of the website and includes detailed community discussion of a wide range of safety issues.

The legal agreement between the user and the YouTube service is accessed from the bottom of each webpage. This comprises the Terms of Service, Community Guidelines – or terms of use – and the privacy policy also accessed from each web page. The Community Guidelines sets out in clear terms common sense rules about use of the service, prohibited content and behaviour and describes for users the process of reporting inappropriate content. The Community Guidelines represent a very clear, succinct statement of permitted and prohibited behaviour and conduct on YouTube. It is integrally linked to the reporting mechanism for flagging inappropriate content/violations of the code and is presented in a very easy-to-understand format. The Community Guidelines also feature a video on staying safe on YouTube.

## ***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 requirement in order to subscribe to YouTube is 13. The provider claims that a cookie is placed on the user's browser to prevent re-registering with a different age. The self-declaration further states that upon notification or if suspected to be younger than 13, a user's account will be closed.

Regarding the mechanisms through which the service provider claims to ensure limited exposure to potentially inappropriate content and contact for children, YouTube claims to have implemented mechanisms that include community flagging, and porn image detection. Automated systems are employed to help classify videos based on their content and meta-data. "Where videos are determined to be unsuitable for younger viewers, such content is demoted in browse pages." Flagged videos (i.e. reported by the community) are reviewed, and not made available to minors. The self-declaration states that users younger than 18 are warned by means of an interstitial page that they are about to watch videos that have been flagged as not appropriate for their age group. The user can then sign in stating that they are older than 18 and watch the video. The provider claims that if they have previously signed in as younger than 18 a cookie placed on their browser will prevent them from watching the video in question.

According to the self-declaration, YouTube has implemented a number of measures including: Safety Mode that allows users to choose not to see "potentially objectionable content they may find offensive" and also to continually develop innovative tools to keep the members of their community safe. The provider also claims to employ digital hashing technologies to prevent the re-upload of files that have been removed from the site for violating the sites' Community Guidelines while YouTube Safety Mode allows users to choose not to see "potentially objectionable content they may find offensive".

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

The minimum age required to use YouTube is 13. Under-13 year olds are blocked from registering on the site. A cookie placed on the user's browser prevents an underage user from attempting to re-register on the site with an older birth date. In testing, this was found to be effective and registration for a 9 year old was denied even when the age was changed to over 13. On removing cookies from the computer used, it was, then possible to register as an older user. Email verification was all that was required for successful registration. According to the self-declaration, content that is deemed by the YouTube community to be inappropriate for under 18 year old viewers is restricted. Unregistered viewers have to sign up and confirm they are over 18 to access any content flagged as adult. In tests, it was confirmed that a registered user below the age of 18 is denied access. In order to prevent minors accessing potentially inappropriate content, YouTube advocates the use of its Safety Mode. Safety Mode is a setting, accessible on the bottom of each webpage. It filters content that may be found to be offensive, even though it is not against YouTube's Community Guidelines or has not been flagged as adult. With Safety Mode enabled, the filtering of age restricted content was found to be effective. It does not show up in video search, related videos, playlists, shows and movies. It is an 'opt in' setting, however, and is not enabled as a default on the accounts of minors. As an additional parental control, the Safety Mode may be locked for a particular browser to ensure that it can't be switched off by minors using that computer.

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

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

Regarding the tools and technologies employed by the service provider 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, the provider claims to provide users with "a variety of tools and advice to help them protect their privacy and to control how others interact with their videos". These options include, among others, the possibility to control how others interact with their videos, the possibility to prevent others from embedding one's videos on 3<sup>rd</sup> party pages and the option to pre and post-moderate comments on videos. According to the provider, users can also choose to only share a video among a certain number of friends or family members. YouTube further claims that users have channels instead of profile pages. These channels display the user names, but not real ones. One advantage of these channels would be that they allow users to post/exchange videos without necessarily having to disclose much personal information. According to YouTube's self-declaration, "YouTube does not have profile pages in the same way as social networking services. (...) YouTube is a platform for exchanging user created content rather than sharing a social profile of one's self". However, if users wish so, they may add personal information to their profiles. It is not clear from the self-declaration,

though, if this information is (automatically) mapped into the user's profile<sup>3</sup> and, thus, visible to other (registered and/or on-registered) users.

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

Users of YouTube have a number of tools and technologies available to them to manage their experience of the service. The aforementioned Safety Mode, when switched on (it is set to off by default), will filter potentially inappropriate content from searches and playlists. Content flagged through YouTube's reporting service will also be inaccessible to account holders under the age of 18 even if Safety Mode is not enabled. The provider in its Self Declaration notes that YouTube does not have profile pages in the same way as a social networking service. However, 'Channels' created by users can act very much like an SNS profile. Primarily designed to present uploaded videos and to display playlists of other YouTube content, a user's channel can be personalised with a variety of information including name, personal interests, hometown, etc. It also contains a list of friends and subscribers to the channel; it includes comments posted on the channel by other users; statistics relating to the channel and video views; and a record of recent activity by the user.

Users are given full control over the information made available or not on their channel, but any information displayed is visible to everyone, registered or unregistered. In a sample account for a minor set up for the purposes of testing, there was no difference in the amount of information visible on the channel to friends and other minors, to other adults or to unregistered users. Default privacy settings make the channel visible to all. In addition, while adding (or editing) information to the channel, users are not warned that this information would be made publicly available to other YouTube users. However, an instruction is permanently available stating that: "Your channel viewers will see links here, including "subscribe" and "add as friend"."

All users are allowed by default to send and receive messages and to comment on videos. Information about a user's favourites, subscriptions and friends list are also set to be viewable by all as a default setting. When uploading video clips (or recording from a webcam) users are presented with a set of broadcasting and sharing options. By default, sharing of video content is set to public so that anyone can search for and view content. Uploaded content may also be set to unlisted, meaning that it does not appear on public spaces on YouTube (in search or on a user's channel) but may be viewed by anyone with the link. A third option is to restrict videos to private viewing so that only those given permission can access them. Comments may also be pre-moderated or restricted to friends only. Additional tools available to the user include the ability to remove comments and report as spam and to block unwanted messages/other users. During the tests, restricting uploaded videos to private viewing proved to be effective: only users who had been given permission were able to access uploaded content and it was not possible to locate it in search.

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<sup>3</sup> According to the provider, although not explicitly stated in the self-declaration, any personal information provided during the account registration process is not publicly displayed by default. The registration process requires the following information: Username, E-mail, Date of birth, and Gender.

## ***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***

YouTube claims to have developed a community policing system so that users can “flag” potentially inappropriate or illegal content that violates the Community Guidelines. Users can select the “Flag” link whenever they encounter inappropriate content. Flagged videos are promptly reviewed by dedicated YouTube staff working 24/7. Specific instructions and guidance on how to report inappropriate or illegal content are found in the Help Centre. The self-declaration states that users can also directly contact YouTube via the Help & Safety Tool to report policy violations or they can directly report issues to local organisations such as Suicide Hotline or the National Centre for Missing and Exploited children (NCMEC) whose contact information is made available via the Safety Resources section.

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. The self-declaration does not explicitly mention if the procedure to report inappropriate conduct or content is easily understandable for children or if it is age-appropriate, although it does indicate that the reporting tools provided “are designed to be self-explanatory and are easy to find”.

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

YouTube’s most prominent mechanism used to report abuse or material that violates the terms of use is the “flag” link available below the viewing window for each video. The flag is an easy to use way to report offensive or inappropriate content and offers a simple two step process for users to request a review by YouTube staff. The Community Guidelines provide clear instructions and information about what happens when a video gets flagged and confirms that flagged videos are not automatically taken down by the system. In this test, a video depicting drug use, visible to a minor, was flagged. No problems were encountered in filing the complaint and an acknowledgement of receipt was given. Within a short time, approximately 4 hours, the video had been age restricted. A query about how to report content was also posted on the Help Forum and a reply was promptly received. Users can also report privacy or harassment complaints and other policy violations through the Help & Safety Tool. This is accessed through the Safety link at the bottom of each page. A Privacy complaint process through an anonymous web-form allows any viewer to file a complaint against another user for harassment or privacy violation. Users are asked to describe the nature of the violation and to provide the username of the offender. Policies on safety issues and instructions about the complaints procedure are comprehensively covered in the Help section. Policy enforcement in relation to sexual or violent content, videos involving minors, and policies on account strikes and account termination are provided.

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

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

Regarding the mechanisms employed by the provider in order to respond to notifications of illegal content or conduct, YouTube claims that when they become “aware that a video violates the law, YouTube cooperates with law enforcement agencies to deal with the video *quickly* and in the proper legal framework”. For instance, certain types of content such as child pornography are reported directly to the National Centre for Missing and exploited Children (NCMEC). The self-declaration further emphasizes that when content is flagged or reported through the Help & Safety Tool, it is reviewed “expeditiously and dealt with appropriately”. Besides, the provider states that via the Safety Resources, users can directly report issues to local organisations such as Suicide Hotline, NCMEC, etc.

## ***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 self-declaration states that users of this SNS are provided with a range of privacy setting options including the possibility for users to make their channel private, the option to share videos privately with a limited number of people or to remove their videos from public listings, etc. Advice and guidelines on how to protect their online identity and privacy are provided to users in the Safety Tips accessible from every page and when setting up an account.

The self-declaration mentions that, basically, no personal information provided during registration is mapped onto the user's profile. "The default information on a users channel shows the user name, not their actual name." After registration, and only if they wished so, users can add some personal information on their channel.

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

Privacy settings allow users to select which 'modules' on their channel to make visible and to edit or restrict the information displayed. According to the company's statement on Principle 6, YouTube provides an option for users to make their channel private. What this means is that users have the option to either make their channel visible or invisible. There is no option to restrict a channel view to friends only. Once a channel is made visible, it is available to all users, registered or unregistered. The default setting for all account holders including minors is to make the channel and the information visible. Users have to deselect options to hide or restrict information. This means that actions taken by a user on YouTube such as favoriting, liking, or uploading a video will be visible to all unless de-selected. These actions appear as a 'feed' in the Recent Activity box on each user's channel. Privacy settings for activity sharing may be accessed directly alongside the Recent Activity box in which users choose which information they wish to share. The activity feed may also be connected to external accounts such as Facebook or Twitter if desired. Users may also restrict others from adding comments to a user's channel. By default, everybody can comment. A setting to pre-moderate comments can be enabled and/or to restrict commenting to friends only.

Slightly different privacy controls are available for uploaded video content. By default, uploaded videos are public. Videos appear on one's channel and also in lists across YouTube. They may also be set to unlisted so that they don't appear in search but may be viewed by anyone with the link. Alternatively, videos may be set to private, so that they are viewable only by named contacts. Videos with restricted privacy settings do not appear on a user's channel.

Privacy settings that control how personal information is made available across the website, as for example as listed within individual video clips, are also accessed via the user's channel. Within an account settings option, users manage whether statistics or data for videos are displayed with video content or whether friends and subscriptions lists will be visible. By default, information is publicly visible and the user must opt out to hide the information. It is also possible to opt out of personalised advertising based on a user's search history. A privacy statement is accessible on each webpage and a link is provided to the general Google Privacy Policy. A range of resources is provided in the Help section and in the community forum. A help article on 'Editing your channel for privacy' listed in the privacy statement was not available though a search of the Help Centre reveals additional information on managing privacy. Deletion of a profile and a user account is easy to accomplish and users are informed that their content will be deleted and no longer available.

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

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

As mentioned under Principles 2 and 5, and as stated in the self-declaration, YouTube employs automated tools such as filtering and porn image detection as well as human forms of moderation such as community flagging to report potentially inappropriate or illegal content. The provider claims that every flagged video is promptly reviewed. Users can also directly contact YouTube via the Help & Safety Tool to report policy violations or they can directly report issues to local organisations such as the National Centre for Missing and Exploited children (NCMEC). The self-declaration further indicates that the support team reviews the videos 24/7 to make sure there is no inappropriate content available on the site.

## Summary of Results and Conclusions

On the website, all the Principles were assessed as very satisfactorily implemented. The main strengths of this SNS are safety information for parent, teachers and younger users is widely available and extensive resources including educational materials; safety tips, etc. are easily accessible to users. YouTube’s Community Guidelines are written in admirably clear and plain language and seek to promote a respectful and common sense approach to sharing video content. Other positive aspects include the fact that reporting abuse on the platform is easily available and efficient. Ready access to privacy settings by clicking on the user’s channel was found to be very user-friendly, effective and easy to manipulate while deletion of a user account is easy to accomplish and users are informed that their content will be deleted and no longer available.

Some areas of attention include:

- Default privacy settings make a channel visible to all, including unregistered users. All users are allowed by default to send and receive messages and to comment on videos. Information about a user’s favourites, subscriptions and friends list are also set to be viewable by all as a default setting.
- Even though YouTube states in its self-declaration that users’ profile pages (channels) are not used in the same way as other social networking services, if users wish so, they can add (plenty of) personal information to their channels. It is also true that YouTube users are given full control over the information made available or not on their channel, however any information uploaded is visible to everyone, including both registered and unregistered users.
- Information contained on one’s personal channel can be modified and hidden as required and user channels as a whole can be made invisible. However, there is no option to restrict its view to friends only or to discriminate between groups of friends.
- The default setting for all account holders including minors is to make information contained on a user’s channel visible. Users have to deselect options to hide or restrict information.
- Safety Mode, is not switched to on by default.

### 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		

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