

**Implementation of the Safer Social Networking Principles for the EU:
Testing of 20 Social Networks in Europe
February 2010**

SULAKE

Mika Rantakokko, Center for Internet Excellence

Introduction

This evaluation of social networking services concerns Sulake Corporation and its two services, Habbo Hotel and IRC-Galleria. Tests were done to the Finnish language versions. The tests were performed on 28.-30.10.2009. Sulake Corporation, founded in 2000, is an online entertainment company focused on virtual worlds and social networking.

Currently Sulake operates three services:

Habbo Hotel: The world's largest virtual world for teenagers. Habbo is a multi-dimensional virtual world and community for teens. Users join by creating a fully customized online character called a Habbo. From there, they can explore many public hang-outs, participate in a variety of activities, connect with friends, decorate their own rooms, and have fun through creativity and self expression. Currently there are Habbo communities in 33 countries on six continents. To date, 151 million Habbo characters have been created and 14.6 million unique users worldwide visit Habbo each month (source: Quantcast and Sulake statistics). Minimum age of the service user in Finland is 10 years; though recommended minimum age by service producer is 13.

IRC-Galleria: IRC-Galleria is currently the most used social networking service in Finland with over 500 000 active registered members. The average age of the users is currently over 20 years. IRC-Galleria is an interactive service where users can e.g. post and share their photos and music on their own customized site, join different communities and communicate with people in many ways. In addition to Finland, IRC-Galleria is currently available as a local service in Germany. Minimum age of the service user is 12 years.

Bobba Bar: Recently established virtual networking service for people older than 16 (not part of self-declaration or this assessment).

The assessed services, Habbo Hotel and IRC-Galleria are fulfilling the Safer Social Networking Principles for the EU quite well. Self-declarations concerning both Habbo Hotel and IRC-Galleria are informative and clear, as well as in line with the EU principles.

Habbo Hotel with main focus on service for teenagers the main point is the anonymity of the service, which is also main point concerning the safety. In the guidance on how to use the Habbo Hotel service it is underlined that you are not allowed to give any personal information where you could be identified. Concerning IRC-Galleria the main focus is being more identifiable; including for example that picture in the profile must be clear enough so person can be recognized from the picture. Security guidance in both services is informative and easy to find.

Reporting on testing results

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

1. To which extent the actions mentioned in the self-declaration are in line with the Principles?

Actions concerning both services which are mentioned in self-declaration are well in line with the Principles. In both services the only exceptions are teachers, which are neglected as actors promoting safe use of SNSs. *This shortage results that the services provided by Sulake are only partially compliant with the Principles.*

2. Have the measures reported in the self-declaration report been implemented?

Reported measures have been implemented. There are clear instructions for users as well as clear information concerning the situation when the rules are not followed.

3. Do the implemented measures work?

Instruction and rules presented in self-declaration works as presented. Sulake also co-operates with governmental organizations and campaigns like Insafe / Safer Internet Day and many other organisations. These collaborators play an important role especially in the case of Habbo Hotel in the services giving guidance about safe use of SNS's.

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

1. To which extent the actions mentioned in the self-declarations are in line with the Principles?

There are age limits both in Habbo (recommended 13 years, minimum 10 years – limits are mentioned in the service, though different ages have no visible effect on how does the service work) and in IRC Galleria (12 years). Minimum age of 10 to access Habbo is not mentioned in self declaration as it is done from international perspective. The self-declaration states that there are no reliable technical tools to guarantee the age. According to the service guidelines moderators monitor user behavior and remove clearly under-age users.

2. Have the measures reported by the signatories in their self-declaration reports been implemented?

Age limits are clearly mentioned in the services. When trying to register as under age person both services deny the access. This feature in both services was tested by ages 7, 9, 9 years 10 months and 11 years 6 months. The registration was denied while confirming the registration. It was possible to register from the same computer, with the same name and email address, only by changing the date of birth.

3. Do the implemented measures work?

There are age limits both in Habbo (10 years) and IRC Galleria (12 years). If trying to register as under age services don't give access. Though, it was easy to register to both services by attempting again with identical information by only changing the age.

Principle 3: Empower users through tools and technology

1. To which extent the actions mentioned in the self-declarations are in line with the Principles?

In Habbo there are no public profiles; and it is also possible to limit others to contact your profile. Default setting in Habbo is that the profile name and character are visible. Also in IRC Galleria it is possible to customize your visible profile and for example put unwanted profiles to black list, so they cannot send comments to you or see your private pictures. Default setting in IRC Galleria is that the profile picture and name are visible. There are no parental tools in Sulake services, excluding the guidelines for parents.

2. Have the measures reported by the signatories in their self-declaration reports been implemented?

Reported measures are been implemented in respective services. There are easy-to-use tools to control which information is visible in the profiles. The Habbo feature of being anonymous was tested by putting imaginative telephone number and name to the profile. This information was removed by moderators. In IRC Galleria the focus is in being identifiable; if you put there a picture from which you cannot be identified you will be asked to send another picture. This feature was tested with the artificial picture provided to the test; there was feedback from moderator to change the picture to something more identifiable.

3. Do the implemented measures work?

The technical tools like filters and automatic monitoring tools are mentioned but not presented in detail. This makes it difficult to evaluate how they work. Personal tools like limiting the access by other users of the service to your profile works well.

Principle 4: Provide easy-to-use mechanisms to report conduct or content that violates the Terms of Service

1. To which extent the actions mentioned in the self-declarations are in line with the Principles?

Reporting tools for illegal/harmful content are very well in line with the Principles. Almost in every view there is a possibility to report conduct or content. In Habbo there is a question mark which you can push if you feel any kind of threat or would like to report something. In IRC Galleria there is a similar button “inform maintenance”.

2. Have the measures reported by the signatories in their self-declaration reports been implemented?

Easy-to-use reporting tools are available all the time, in every situation. You can report all kind of content, and also send report via various ways, including telephone line and e-mail.

3. Do the implemented measures work?

Reporting mechanisms about harmful/illegal content were tested asking for help because someone is sending a scary message. Reporting was easy to be done and fulfilling the Safer Social Networking Principles in both services. In Habbo Hotel there is a help tool which can be used for this purpose. In IRC Galleria there is a report-button in every view. In both services you got feedback to your registered e-mail. When sending in a report there was an immediate reply to the e-mail concerning the report with information that the report/request will be handled within next three days. In the more detailed reply which came later was additional questions and guidance on how to react to scary messages. Concerning the reply from IRC Galleria the moderator requested information about which nickname sent the scary messages so they could check it and take the necessary actions. In IRC Galleria FAQ it has been described that you will not get detailed reply about what will be done with the report concerning other profiles in the service. Concerning the reply from Habbo there was also a question to send additional information.

Principle 5: Respond to notifications of Illegal content or conduct

1. To which extent the actions mentioned in the self-declarations are in line with the Principles?

Self-declaration is fully in line with the Principles. According to the self-declaration the reports referring to illegal content and conduct are top priority of Sulake SNS's. Reports are handled according to that approach, as urgently as possible. There is also good collaboration with authorities, and illegal content is reported to them if there appears such.

2. Have the measures reported by the signatories in their self-declaration reports been implemented?

The measures are described in the rules and regulations as well as concerning the use of the services. Also the close collaboration with the authorities is mentioned both in Habbo and IRC Galleria case.

3. Do the implemented measures work?

These measures were not tested in this assessment.

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

1. To which extent the actions mentioned in the self-declarations are in line with the Principles?

Actions are in line with the Principles. Concerning Habbo there is even more secure situation, than with ordinary service because in that service the participants are anonymous; Habbo users are not allowed to give any identifiable information like real-life photos, videos or share any personal information. This principle is informed and followed very strictly contributing centrally to the safety of the service.. Though it is also possible to limit who can access your Habbo profile.

IRC Galleria is based on certain publicity; ia. you must appear there with your own face. At the same time you can still customize the user experience and privacy settings according to your wishes.

2. Have the measures reported by the signatories in their self-declaration reports been implemented?

Measures mentioned in self declaration have been implemented in the services.

3. Do the implemented measures work?

The measures can prevent unwanted contacts and visibility.

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

1. To which extent the actions mentioned in the self-declarations are in line with the Principles?

Self declaration is in line with the Principles. There are both human moderated reviews complemented with technical automatic filtering.

2. Have the measures reported by the signatories in their self-declaration reports been implemented?

There is limited information about moderation and automatic tools to follow up the services and content there. This limited information is understandable due to the nature of the guardian role.

3. Do the implemented measures work?

These measures were not tested in this assessment. There are some statistics giving a view to the success of used tools; according to the SNS the amount of pictures against the service rules in IRC Galleria have gone down from 1/500 to 1/1000 during the last three years.

Summary of results and Conclusion

Awareness raising of safe use principles are clear covering all the main points to guarantee safe activities within the services, taking also into account different age groups. Teachers as a target of safety education messages are the only groups which have been forgotten.

Habbo Hotel has the minimum age of 10 years, while recommended minimum age is 13 years; though there is no different treatment for those youngest users. IRC Galleria has an age limit of 12. Registration with under-age profile is not possible, though you can register after using under-age just by changing the date of birth and keeping the rest of the registration information the same as before. Age limits are difficult to control, but the services are doing quite well by combining techniques with human moderation for that purpose. Especially in Habbo Hotel the users are also receiving lot of education about safe use of internet, partly due to the age structure.

Users of both Habbo Hotel and IRC Galleria can control the public information ia. by blocking the information which is not wanted to be public as well as by blocking unwanted people contacting them. According to the tests both services provide easy access to report content or conduct that violates the terms of service; reporting possibility is available all the time. These reports are the top priority of the maintenance. Notifications are taken very seriously, and if needed handled in collaboration with authorities. Habbo Hotel service is based on anonymity with no pictures and real contact names while IRC Galleria requires certain public profile.

Sulake Corporation and its SNS's Habbo and IRC Galleria are well functioning services complying quite well with the Safer Social Networking Principles for the EU and self-declaration.

Tables of compliance concerning Sulake Inc. SNS's Habbo Hotel and IRC Galleria
Assessment of the Principles vs. the Self-declaration

Principle	Compliant	Partially Compliant	Not Compliant	Not Applicable	Comments/Clarification
1		X			Teachers are not taken into account concerning the awareness raising.
2	X				
3	X				
4	X				
5	X				
6	X				
7	X				

Assessment of the Self-declaration vs. the measures implemented on the SNS

Principle	Compliant	Partially Compliant	Not Compliant	Not Applicable	Comments/Clarification
1	X				
2		X			It was possible to register with the same information by just changing the date of birth from under-age to sufficient age.
3	X				
4	X				
5	<i>Not Tested</i>				
6	X				
7	<i>Not Tested</i>				

The copyright of this report belongs to the European Commission. Opinions expressed in the report are those of the authors and do not necessarily reflect the views of the EC.