Privacy Policies on Kids’ Favourite Web Sites

Jacquie Burkell, University of Western Ontario
Valerie Steeves, University of Ottawa

Children’s Online Privacy Protection Act

- Sites directed at children
- Privacy policy
- Verifiable parental consent for children under 13 years of age
Personal Information Protection and Electronic Documents Act

- Consent-based information regime
- Openness about information practices
- Legal guardian can consent for minor

Is Web Use Supervised?

- COPPA and PIPEDA provide for and even assume parental involvement for consent
- BUT, in 2005...
  - only 13% of children surveyed are “mostly” with an adult when using the Internet
  - Among the youngest respondents (grades 4-5), 73% are ‘sometimes’ or ‘usually’ alone when they use the Internet
Transparent Information Practices + Voluntary Disclosure = Informed consent

Overview
- How accessible are privacy policies on the sites kids visit?
- How easy are they to understand?
Kids’ Favourite Sites

• 5,272 kids
• 2,800 favourite sites
• Over 25% picked Neopets
• Over 25% picked Addictinggames

Kids’ Favourite Sites

Game sites
Multimedia/streaming sites
Special interest sites
Shopping sites
Television sites

Only 1% were sites directed at children
The Top 50 Sites

- Represent over one-half of all choices
- 50 of 50 (100%) are commercial sites
- 45 of 50 (90%) ask kids to register
- 47 out of 50 (94%) collect personal information
- 48 out of 50 (98%) have privacy policies*

* As of September, 2005; one additional site has added a privacy policy since that date

An accessible policy is …

- Linked directly from the home page
- Immediately visible on the home page
- Emphasized to be highly visible
- Clearly labeled to identify content
Is there a privacy policy?

- 48 of 50 (96%) have a link to a privacy policy
- 1 site has a ‘dead link’
- 1 site has no link, no policy

How many links to the policy?

- 3 websites with 2 links to the policy
- 45 websites with 1 link
- 1 website with a link, no policy
Can you see it immediately?

- First page, no scrolling: 21
- 1, 2, or 3 screenlengths of scrolling: 18
- More than 3 screenlengths scrolling: 9
- 1 site has a link, but not on the home page

Where is the link?

- Top: 7
  - centre: 2
  - right: 5
- Side Navigation: 2
- Bottom: 39
  - centre: 29
  - left: 10
- Not on home page: 1
How visible are the links?

- Unique, highly visible: 5
- Primary navigation/Key link: 3
- Secondary navigation: 16
- Fine Print: 22
- Minimized: 3

How are the links labelled?

- 47 of the 49 links use the word ‘privacy’
  - Privacy
  - Privacy policy
  - Safety and privacy
- 2 of the 49 do not
  - Terms and Conditions
  - Legal
Doing it right:

- Candystand
- Kazaa
Making it hard to find:

- Newgrounds
The rest of the picture…

- Getting to the policy is only the first step
- Privacy policies must be understood by the users
An understandable policy is…

- Relatively short
- Written at an appropriate reading level
- Easy to navigate, with appropriate sub-headings
- Self-contained (does not require linking out)

How long are the policies?

- Average word count: 1902
  - Minimum: 121
  - Maximum: 6414
What is the reading level?

- Flesch Reading Level (60-70 is acceptable for adult readers, higher is better)
  - Average: 36.32
  - Best: 58.9 (ebaumsworld)
  - Worst: 23.3 (flowgo)

- Flesch Reading Level (Grade 8 is acceptable for adult readers)
  - Average: 11.66
  - Minimum: 9.1 (mxtabs)
  - Maximum: 12 (msn)

What about navigation?

- No navigation aids: 5 (NBA)
- Text Headings: 35 (msn)
- Linked Navigation: 8 (CHUM)
What about linking out?

- 25 sites have self-contained privacy policies
  - 1 links to other pages on the site *(miniclip)*
  - 24 are on a single page *(neopets)*
- 23 sites require linking out for complete privacy information *(ebaumsworld)*

Privacy policies on kids’ favourite sites are…

- Not uniformly easy to find
- Long
- Written at a high reading level
- Difficult to navigate
Do you read privacy policies on the sites you visit?

- Always - 5%
- Sometimes - 44%
- Never - 51%

If a web site has a privacy policy, you can be sure they will not share any personal information they collect from you with others.
On the websites kids visit, finding out about privacy is relatively difficult…

BUT

Disclosing personal information is NOT

Disclosure is…

- Easy
- Ubiquitous
- Fun
- Seamless
- Tied to kids developmental needs
The good news...

- The sites kids visit usually have privacy policies
The bad news

- Policies are not easy to find
- Once found, many policies are long, and written at a level too difficult for children and many adults
- Many policies are difficult to navigate
- Many policies are not self-contained

The worst news

- In contrast, disclosure of information is made easy, fun, and natural
We need a new approach

- To ensure that privacy policies are read
- To ensure that privacy policies are understood
- To ensure that decisions about privacy are directly linked to disclosure