



---

# Implementation Questionnaire

---

November 2013

---

Centre for Social and Educational Research  
Dublin Institute of Technology



## Introduction

### Notes/instructions on completing this template

- Please complete all sections and all questions as far as possible
- Where a question or section is not applicable, please mark as N/A
- Where is overlap – or no change – to information previously submitted in company statement of commitments, please simply enter “refer to self-statement”
- URLs or screenshots (with links) are particularly useful in illustrating individual points
- Please add any additional information/data relevant to the submission at the end of the appropriate Principle
- In case you have different solutions in EU markets, please provide examples in the relevant sections

Contact details for any clarification or any assistance in completing this template:

Brian O'Neill Email: [brian.oneill@dit.ie](mailto:brian.oneill@dit.ie) Tel. + 33 86 8030050

Thuy Dinh Email: [thuy.dinh@dit.ie](mailto:thuy.dinh@dit.ie) Tel. + 353 1 402 4173

### 1. Name of the company on whose behalf this submission is made:

Telenor Serbia

### 2. Country or primary markets where products/services are offered (in EU) to which this submission applies. Please indicate all EU-markets in which your company operates

Serbia

### 3. Product(s) or services included within the terms of this submission

Telecommunication services

**4. Nature of activity**

- Manufacturers of desktop and laptop computers, mobile phones, tablets, TV set top boxes and gaming consoles*
- Network operators and connectivity providers*
- Online content provider*
- Online service provider*
- Other (please specify): .....*

**5. Person(s) completing the report**

Name: Sanja Rajacic

Position: Corporate Responsibility Specialist

Email: sanja.rajacic@telenor.rs

## Principle 1 – Content

### Commitments

Signatories should:

- Indicate clearly where a service they offer may include content considered not to be appropriate for children and display prominently options which are available to control access to the content. This could include, where appropriate for the service, tools to manage access to certain content, advice to users or a recognised system of content labeling.
- Display prominently and in an easily accessible location the Acceptable Use Policy, which should be written in easily-understandable language.
- State clearly any relevant terms of service or community guidelines (i.e. how users are expected to behave and what is not acceptable) with which user generated content must comply.
- Ensure that reporting options are in the relevant areas of the service.
- Provide notice about the consequences for users if they post content which violates terms of service or community guidelines.
- Continue work to provide innovative solutions able to support child safety protection tools and solutions.

**Please indicate, when relevant, the approach taken at Group/Corporate level and if you have different solutions in EU Market.**

Refer to self-statement.

**1. Do you provide a mechanism for consumers to provide feedback, report an issue or file a complaint about the appropriateness of a piece of content?**

Yes

No

Not applicable (please explain): .....

If yes, please provide details:

Telenor Serbia is not a hosting provider and does not produce own content.

Telenor Serbia through its foundation supports the Center for Safer Internet in Serbia that established Internet Hotline to allow the reporting and processing of submissions of illegal or harmful content on the Internet. Main priority in the work of the hotline is countering the spread of child sexual abuse images, sexual exploitation and physical and psychological attacks against children.

**2. Do you offer a means for restricting / blocking access to potentially inappropriate content for users of your service or product?**

Yes  
 No  
 Not applicable (please explain): .....

If yes, please provide details of mechanisms in place:  
 In 2011, Telenor Serbia in partnership with the Serbian Ministry of Interior, introduced filters for blocking access to illegal websites with elements of child sexual abuse. Telenor Serbia users that attempt to access website of this type from their mobile telephone or computer are being forwarded to our "Stop page". At the same time, the Serbian Ministry of Interior Cyber Crime Department submits Telenor Serbia a list of sites that the Ministry of Interior and Interpol have determined to contain illegal child sexual abuse material.

**3. Do you provide any information, educational resources or advice for users in any of the following areas?**  
 (tick as many as apply)

Content classification or labeling guidelines  
 How to block or restrict access to content  
 How to report or flag content as inappropriate  
 Safe searching  
 Information about your company's content policy in relation to children  
 Not applicable (please explain): .....

If yes, please provide details including the format of any material provided (video, text, tips, games, FAQs, etc.):  
 Telenor Serbia offers Kaspersky Internet Security software with integrated parental control function for free to all customers that use mobile broadband packages. This module grants an ability to control different actions and access to Internet in order to limit the access to following content:

- web sites for adults, web sites with pornographic content, etc.
- chat rooms, online games, online auction web sites, etc.

Limitation of the Internet access is enabled with selection of predefined profile – child, teenager and parent. For each of these profiles different restriction levels are defined in order to protect children and teenagers from threats related to computer and Internet usage.  
<http://www.telenor.rs/?page=6798>  
 Telenor Serbia on its website also advises its users about the possibility for reporting inappropriate content on the Internet Hotline, which is maintained with support from the Telenor Serbia Foundation.  
<http://www.telenor.rs/en/About-Telenor/Corporate-Responsibility/Telenor-Foundation/Other-Activities/-Net-Patrol-Website-Against-Illegal-Internet-Content>

**4. Where is your company's Acceptable Use Policy (AUP) located?**

Telenor Serbia is not a hosting provider and does not produce own content. Regarding the 3<sup>rd</sup> party content, contractual obligation of 3<sup>rd</sup> party is to follow the legislation in Serbia regarding protecting minors. Access to adult content (and its' communication) over Telenor portals is limited to period from 00-06h.

**5. Does the AUP or separate give clear guidelines with which user generated content must comply (including details about how users are expected to behave and what is not acceptable)?**

Yes

No

*Not applicable* (please explain): Telenor Serbia does not provide UGC platform.

If yes, please identify relevant policy:

**6. Do you provide notice about the consequences for users if they post content which violates terms of service or community guidelines?**

Yes

No

*Not applicable* (please explain): Telenor Serbia does not provide UGC platform

If yes, please identify relevant policy:

## Principle 2 – Parental Controls

### Commitments

Signatories should assist parents to limit their children’s exposure to potentially inappropriate content and contact.

- Manufacturers should optimise hardware design to provide products which simply and clearly help parents to set appropriate levels of control on devices.
- Network providers should provide necessary tools and settings across their services to enable parents to set appropriate levels of control.
- Service and content providers should make available the necessary tools and settings across their services to enable parents to set appropriate levels of control

**Please indicate, when relevant, the approach taken at Group/Corporate level and if you have different solutions in EU Market.**

Refer to self-statement.

**1. Please outline the availability of any parental control tools and settings across your product or service that allows parents to set appropriate levels of control? Include relevant links/ screenshots where available:**

Telenor Serbia offers Kaspersky Internet Security software with integrated parental control function for free to all customers that use mobile broadband packages. This module grants an ability to control different actions and access to Internet in order to limit the access to following content:

- web sites for adults, web sites with pornographic content, etc.
- chat rooms, online games, online auction web sites, etc.

Limitation of the Internet access is enabled with selection of predefined profile – child, teenager and parent. For each of these profiles different restriction levels are defined in order to protect children and teenagers from threats related to computer and Internet usage.

**2. . If applicable, please describe the features offered by the parental controls? E.g. restricting web access, customization, monitoring, other restrictions.....**

The Kaspersky module grants an ability to control different actions and access to Internet in order to limit the access to following content:

- web sites for adults, web sites with pornographic content, etc.
- chat rooms, online games, online auction web sites, etc.

Restriction of Internet access is carried out by each user being allocated one of 3 predefined profiles:

- Child
- Teenager

-Parent

Each of the mentioned profiles enables access to Internet sites according one of 3 predefined restriction levels.

The restriction level is a set of configurations which enables access web resources.

**3. In relation to parental controls, which of the following educational and information resources to do you offer?**

(tick as many as apply)

- Company policy in relation to use of parental controls*
- Guidance about how to use parental controls*
- Educational or awareness-raising resources about the use of parental controls*
- A promotional or marketing channel for the uptake of parental controls*
- External links to educational material/resources about the use of parental control*

[Please provide details including links or screenshots as relevant]

<http://www.telenor.rs/en/Consumer/Internet/Kaspersky-Internet-Security/Instructions>

**4. Please outline any additional safety tools or solutions not detailed above that relate to parental controls, including any planned implementation of new features or procedures?**



## Principle 3 – Dealing with abuse/misuse

### Requirements

Signatories should:

- Provide a clear and simple process whereby users can report content or behaviour which breaches the service's terms and conditions.
- Implement appropriate procedures for reviewing user reports about images, videos, text and other content or behaviour.
- Provide clear information to users on all available report and review procedures.
- Place and review regularly links to these reporting options in appropriate areas of the service (e.g. where users view user-generated content or interact with other users) and provide guidance on what to report.
- Place links to relevant child welfare organisations or specialist providers of advice (e.g. about anorexia or bullying) and other confidential helplines/support services in appropriate areas.
- Ensure that moderators who review user reports are properly trained to determine or escalate content or behaviour presented to them

**Please indicate, when relevant, the approach taken at Group/Corporate level and if you have different solutions in EU Market.**

Refer to self-statement.

**1. Please provide details of company policy relating to abuse and misuse (involving images, videos, text and other content or behaviour) on your product or service.**

Telenor Serbia does not host either professional or user-generated content.

**2. Please describe the process or mechanism available for users to report abuse/misuse (involving images, videos, text and other content or behavior) on your product or service).**

[Please provide details including links or screenshots as relevant]

Telenor Serbia is cooperating with newly established Serbian Center for Safer Internet, funded by European Commission. Center for Safer Internet is in process of becoming the member of INHOPE network and establish the online mechanism "Net Patrol" for reporting inappropriate, offensive and harmful content on internet by implementing all relevant INHOPE guidelines and processes in cooperation with Serbian Ministry of Interior and Ministry of Foreign and Internal Trade and Telecommunications.

Schematic Representation of the Procedure



**3. Where is the reporting button/ mechanism located?**

(tick any that apply)

- On each page of the website/service
- Close to the point where such content might be reported
- In a separate location such as a safety page
- In a browser extension
- In a separate app for a connected device

x Other (please specify):

There is a separate web site, called Net patrol for reporting this kind of content -

[www.netpatrola.rs](http://www.netpatrola.rs)

**4. Who may use such a reporting mechanism?**

(tick any that apply)

- Only registered user/profile in which content is located
- All registered users of the product/service?
- x Everyone including non-users, e.g. parents/teachers who are not registered for the service
- Other (please explain): .....

**5. Which kinds of content can users report?**

Content that belongs to the following categories can be reported through the Net patrol mechanism:

- photographs, video and/or textual materials that represent sexual molestation of a minor, as well as any other forms of child pornography;
- photographs, video and/or textual materials which show an adult person impersonate or act like they are a minor while engaged in sexual molestation or pornography;
- photographs, video and/or textual materials which promote, propagate or incentivize the commitment of psychological or physical violence over minors;
- photographs, video and/or textual materials which promote, propagate or incentivize hate speech aimed towards groups or individuals based on their gender, sexual orientation, race, ethnicity or religion.

**6. Which of the following information do you provide to users?**

(tick any that apply)

*Advice about what to report*

*Advice about how to make a report*

*Pre-defined categories for making a report*

*How reports are typically handled*

*Feedback to users*

*Other website/external agency for reporting abuse/ misuse content?*

*Other (please specify): .....*

**7. Please provide details of any other means, in addition to a reporting button/icon, to report content or behavior which breaches your service's terms and conditions**

[Please provide details including links or screenshots as relevant]

**8. Please outline briefly any other procedures or programmes offered by your service not detailed above that relate to abuse /misuse.**

## Principle 4 – Child Sexual abuse content or illegal contact

**Requirements**

Signatories should:

- Co-operate with law enforcement authorities, as provided for in local law, regarding child sexual abuse content or unlawful contact.
- Facilitate the notification of suspected child sexual abuse content to the appropriate law enforcement channels, in accordance with existing laws and data protection rules.
- Ensure the prompt removal of illegal child sexual abuse content (once it has been confirmed as illegal by the relevant public authority) in liaison with national law enforcement.
- Provide relevant additional information and/or links to users so they can make a report or obtain information about appropriate agencies or organisations that users can contact about making a report or obtaining expert advice, at national and EU level (e.g. law enforcement agencies, national INHOPE hotlines and emergency services).

**Please indicate, when relevant, the approach taken at Group/Corporate level and if you have different solutions in EU Market.**

Refer to self-statement.

**1. Which of the following mechanisms are provided on your product or service to facilitate the notification or reporting of suspected child abuse content?**

(tick any that apply)

- Company-own hotline reporting button or telephone number*
- Link or button for external national or regional INHOPE hotline*
- Emergency services*
- Law enforcement agency*
- Other external agency (please specify): .....*

**2. Please outline briefly the procedures to be followed if illegal content were to be discovered on your service.**

Telenor Serbia in partnership with the Serbian Ministry of Interior, introduced filters for blocking access to illegal websites with elements of child sexual abuse. Telenor Serbia users that attempt to access website of this type from their mobile telephone or computer are being forwarded to our "Stop page". At the same time, the Serbian Ministry of Interior Cyber Crime Department submits Telenor Serbia a list of sites that the Ministry of Interior and Interpol have determined to contain illegal material.

**3. Do you provide links to any of the following to enable users gain additional information in relation to child sexual abuse content or illegal contact?**

(tick any that apply)

- Links to relevant child welfare organizations/specialist providers of advice*
- Other confidential helplines/support services*
- Law enforcement agencies*
- INHOPE*
- Other (please specify): .....*

**4. Please outline briefly any additional procedure in place within your company not detailed above to ensure that you comply with local and/ or international laws with regard to child sexual abuse and other illegal content?**

## Principle 5 – Privacy and Control

### Requirements

Signatories should:

- Manage privacy settings appropriate for children and young people in ways that ensure they are as safe as is reasonably possible.
- Offer a range of privacy setting options that encourage parents, children and young people to make informed decisions about their use of the service and the information they post and share with others online. These options should be easy to understand, prominently placed, user friendly and accessible.
- Take steps, where appropriate and in accordance with legal obligations, to raise user awareness of different privacy controls enabled by services or devices and enable users to use these as appropriate.
- Make reasonable efforts to raise awareness among all parties, service, content, technology and application providers, including public bodies, of industry good practice in relation to the protection of children and young people online

**Please indicate, when relevant, the approach taken at Group/Corporate level and if you have different solutions in EU Market.**

Refer to self-statement.

**1. Please provide details of your company's published privacy policy in relation access, collection, sharing and further use of data from minors under the age of 18 when utilizing your product or service?**

Telenor Serbia Privacy Policy sets out the principles and requirements for processing and protection of personal data in Telenor Serbia.

This Policy applies to processing of personal data with the care and awareness which is required according to laws and regulations in order to safeguard the interests of the data subjects.

**2. Are distinct privacy settings deployed to prevent access to information on for users under the age of 18?**

Yes

No

Not applicable (please explain): .....

**If yes, please briefly outline available age-appropriate privacy settings (Provide details including relevant links/ screenshots on your website)**

Telenor Serbia is in compliance with Serbian Law on the Protection of Personal Data and at the same time is implementing the principles defined in Telenor Group Privacy Policy and Manual on Privacy on the local level. Also, we are contributing to raising awareness among the subscribers in regard to the fact that their personal data are their property, and, as a mobile and Internet provider, offer to them protection of those rights, as defined by the law and the state.

**Please identify default settings for each age category of under 18s, as relevant:**

**Please identify any steps you have taken to ensure that these settings are easy to understand, prominently placed, user friendly and accessible.**

**3. Where are users able to view and change or update their privacy status? tick any that apply)**

- On each page of the website/service
- At each point where content may be posted
- In separate location such as a settings/safety/privacy page
- In a browser extension
- In a separate app for a connected device
- Other (please specify): .....

[Please provide details including links or screenshots as relevant]

**4. Which of the following information, resources or help features (if any) are provided to encourage users to make informed decisions about their privacy or the information they share?**

- Tips/advice to users at the point of setting privacy options*
- FAQs*
- Help or educational resources in a separate location of service*
- Links to any external NGO agencies offering education or awareness-raising related to privacy*
- Links to governmental or EC agencies (Office of Data Protection Commissioner, ENISA etc.) in relation to privacy and data protection*
- Other (please specify): .Link to Telenor Serbia dedicated e-mail address of Local Privacy Officer (lpo@telenor.rs).....*

[Please provide details including links or screenshots as relevant]

**5. Please outline briefly any additional policies or activities (existing or proposed), not detailed above, to ensure that personal information is protected, using reasonable safeguards appropriate to the sensitivity of the information.**

General Contractual Clauses for usage of Telenor Serbia services, accepted by individual customers by signing the Contract. Published at [www.telenor.rs](http://www.telenor.rs) public internet page.



## Principle 6 – Education and Awareness

### Requirements

Signatories should:

- Educate children and young people and give them up to date information to manage their access and settings in relation to content, services and applications, adding support where possible to existing initiatives and partnerships.
- Provide advice about features of the service or functionality that are available to allow parents to improve the protection of children, such as tools to prevent access to certain types of content or service.
- Provide links to other sources of relevant, independent and authoritative advice for parents and carers, teachers, and for children.
- Provide access to information that will help educate parents, carers, teachers and children about media literacy and ethical digital citizenship, and help them think critically about the content consumed and created on the internet.
- Encourage parents and teachers to use this information and talk to their children/pupils about the issues arising from the use of online services, including such topics as bullying, grooming and, where relevant, cost management

**Please indicate, when relevant, the approach taken at Group/Corporate level and if you have different solutions in EU Market.**

**1. Does your company provide its own educational resources aimed at any of the following groups?**

Younger children, i.e. under 13s

Teenagers <18s

Parents and carers

Teachers and other adults

Others (please specify): .....

**2. Which of the following topics are included within your own company educational materials?**

**(tick any that apply)**

Online safe behaviour  
 Privacy issues  
 Cyberbullying  
 Download and copyright issues  
 Safe use of mobile phones  
 Contact with strangers  
 Other topics (please specify) .....

**3. With reference to any educational material you provide, which of the following methods do you use? (tick any as apply)**

Documentation provided with product/contract on purchase/first registration  
 A required presentation by salesperson completing sale  
 Displays/leaflets positioned prominently in stores  
 Notification by email / on-screen statement / other means when product or contract is purchased or first registered  
 Prominent notifications, resources or pop ups on website  
 Helpdesk (telephone or online)  
 Other (please specify): .....  
 Telenor Serbia is implementing the project "Stop Digital Bullying" in cooperation with UNICEF and Serbian Ministry of Education and Science. The project is aiming to prevent and decrease violence against and among children and ensure safe usage of digital media and is including following stages:
 

- Research study on the frequency and forms of digital bullying in schools and protection measures;
- Development of instructions and guidelines for the protection from digital bullying for three target groups – school children, parents and teachers;
- Training for children and their teachers as the future peer educators;
- Workshops for school children, parents and teachers on benefits of mobile communication usage and prevention measures for different digital bullying forms;
- Raising awareness of all target groups through different communication channels (print and online media with the focus on social networks).

**4. Please provide details of any links to other external organisations, or relevant, independent and authoritative advice for parents/carers, teachers, and for children?**

**5. Please provide details of any campaigns, or active involvement in industry partnerships on specific topics to raise public awareness of digital safety for children and young people?**

Raising awareness campaign through the facebook page "Biraj reci hejt spreci" - <https://www.facebook.com/BirajReciHejtSprecj> that has 4715 followers at the moment.

<p><b>6. Please provide details of any partnerships with <u>NGO, civil society or other educational agencies</u> or campaigns to raise public awareness of digital safety for children and young people.</b></p>
<p>Ministry of Education of the Republic of Serbia, UNICEF and Telenor Serbia started a long term partnership in 2012, to promote safe usage of internet among children, teachers and parents and address different forms of digital bullying that children are facing by using modern technologies. The tripartite Partnership named “Stop Digital Bullying” involves unique example of leveraging the business, government and non-profit sector, through maximizing the core competencies and expertise of each actor, combining resources, technical expertise, and bringing innovative solutions in program implementation.</p>
<p><b>7. Please outline briefly any of your own company initiatives in <u>media literacy and ethical digital citizenship</u>, designed to help children and young people to think critically about the content consumed and created on the internet.</b></p>
<p>Telenor Serbia initiatives in media literacy and ethical digital citizenship are conducted under the “Stop Digital Bullying” project at the moment.</p>
<p><b>8. Please provide details of any advice and supports <u>to encourage parents or teachers to talk to their children/</u> pupils about the opportunities and risks arising from their use of the internet.</b></p>
<p>Telenor Serbia and its partners encourage parents and teachers to talk to their children and pupils through the activities of the “Stop Digital Bullying” project.</p>
<p><b>9. Please outline any additional activities or initiatives <u>not detailed above</u> that relate to education and awareness-raising offered by your service or product.</b></p>

**ANNEX**

<b>COUNTRY</b>	<b>PRODUCT/SERVICE</b>	<b>STATUS</b>	<b>COMMENTS</b>
Austria			
Belgium			
Bulgaria			
Croatia			
Cyprus			
Czech Republic			
Denmark			
Estonia			
Finland			
France			
Germany			
Greece			
Hungary			
Ireland			
Italy			
Latvia			
Lithuania			
Luxembourg			
Malta			
Netherlands			
Poland			
Portugal			
Romania			
Slovakia			
Slovenia			
Spain			
Sweden			
United Kingdom			