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:
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1. Name of the company on whose behalf this submission is made:
Telenor Sweden
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
Sweden
3. Product(s) or services included within the terms of this submission
Telecommunications services

4. Nature of activity

☐ *Manufacturers of desktop and laptop computers, mobile phones, tablets, TV set top boxes and gaming consoles*

X *Network operators and connectivity providers*

☐ *Online content provider*

☐ *Online service provider*

☐ *Other* (please specify): .....

5. Person(s) completing the report

Name: ...Johnny Gylling.....

Position: ...CSR coordinator.....

Email: johnny.gylling@telenor.com .....

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?

X *Yes*
☐ *No*
☐ *Not applicable* (please explain): .....

If yes, please provide details:
Customers of Bredbandsbolaget (Telenor subsidiary) have the possibility to report abuse through our abuse mail connected to the Security department. A report may concern, for example, possession or exposure of child pornography, threats / harassment / abuse or other offensive behavior. At Telenor.se, Bredbandsbolaget.se and Glocalnet.se we also inform about our cooperation with the Swedish police and our partnership with ECPAT (End Child Prostitution, Child Pornography and Trafficking in Children for Sexual Purposes).

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

X *Yes*
☐ *No*
☐ *Not applicable* (please explain): .....

If yes, please provide details of mechanisms in place:
We block websites with child pornography content in cooperation with the Swedish police. In addition to the blocking of web sites with child sexual abuse content, Telenor has taken a stand against sexual abuse of children by the partnership with ECPAT Sweden. During 2011 we implemented ECPATs working place regulations into our own relevant work place policies. Telenor's, Bredbandsbolaget and Glocalnets websites, we inform about our standpoint and our partnership with ECPAT.

Telenor also offers special mobile subscriptions for children which contain services such as blocking of payment services and a chat. Telenor (mobile broadband), Bredbandsbolaget and Glocalnet offers parental control (included in a security package provided by third party), which gives parents the possibility to control what websites their children can visit and ability to protect them from offensive content. This is an extra service which the customer can try for three months without fee.

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*
x *How to block or restrict access to content*
x *How to report or flag content as inappropriate*
x *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 Surf Academy was initiated in order to develop student's and the teacher's views upon the advantages of using Internet in school. The starting point is that many students have knowledge about the Internet that the teachers do not have. By providing the students with educational tools and practical tips, they can spread the knowledge further to classmates and teachers. During an educational day the students are teached by experts in copyright, criticism of sources, searching, bullying etc.

Telenor Surf Academy aims to inspire and stimulate new thinking in education, with the purpose to stimulate development and user benefits of IT in schools. Also the project wants to demonstrate the positive benefits of the Internet and its role in the knowledge society as well as creating a dialogue between young people and adults about the risks associated with the Internet. www.telenor.se/surfacademy

Since 2011 Telenor Sweden has an ECPAT-team which consists of employees at our different

offices. The team works to raise awareness about child sex trade among our employees, as well as among customers, trough lectures and dissemination of information. The team spread information internally and externally on how to report suspicion

Telenor is also an active member of Surfa Lugnt www.surfalugnt.se which provides parents with knowledge and advice on children's internet usage.

Telenor Sweden informs our customers regularly on these issues through different channels: on our websites, by letter (invoice attachments), in customer magazines and in joint campaigns with our partners.

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

N/A

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*
X☐ *Not applicable* (please explain): .....
Telenor Sweden is an Internet Service Provider, not a content provider.

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* X *Not applicable* (please explain): Telenor Sweden is not a content provider..... 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.
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 offers a mobile subscription package for families called "family flex". Within family flex parents are able to control costs and surf for their children. Telenor offers a security package from F-secure where parents are able to e.g. block certain content (like gambling, porn and violence) and specify which sites are allowed to visit. The security package applies to smartphones (Androids today but Iphone will be implemented soon), surf pads or computers and is free the first three months. http://www.telenor.se/privat/mobil-telefoni/plustjanster/stold-virusskydd.html Bredbandsbolaget also offer the security package from F-secure. http://www.bredbandsbolaget.se/bredband/sakerhetspaket.html. The security package is free the first three months. They also have advice to parents about their children's surfing on their website, produced by Surfa Lugnt.
2. If applicable, please describe the features offered by the *parental controls*? E.g. restricting web access, customization, monitoring, other restrictions…..

- Blocking content types (like gambling, porn and violence)
- Specify which sites are allowed to visit
- Check which sites have been visited
- Control at what times your child are surfing
- Control how long your child can surf
- Create different profiles for you as a parent and for your teenager and / or children

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

See above.

[Please provide details including links or screenshots as relevant]

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?

Telenor Sweden is planning to introduce a single report button where users can anonymously report content on child sex abuse images directly to ECPAT Sweden. ECPAT can then distribute relevant information to the Police.

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.
Customers of Bredbandsbolaget have the possibility to report abuse through our abuse mail connected to the Security department. A report may concern, for example, possession or exposure of child pornography, threats / harassment / abuse or other offensive behavior. At Telenor.se, Bredbandsbolaget.se and Glocalnet.se we also inform about our cooperation with the Swedish police and our partnership with ECPAT (End Child Prostitution, Child Pornography and Trafficking in Children for Sexual Purposes).
2. Please describe the *process or mechanism* available for users to report abuse/misuse (involving images, videos, text and other content or behaviour) on your product or

service).
http://www.bredbandsbolaget.se/kundservice/sakerhet/sakra-tips/anmal-missbruk.html Here is also a link to ECPAT hotline and to the Police. Reporting button is designed and will be implemented in a short time. [Please provide details including links or screenshots as relevant]
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): .The report button is planned to be implemented as a Book Mark which will be reachable from each website.
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?

The planned Report button will primarily focus on child sex abuse images and ECPAT will be the receiver of the reported URL:s.
6. Which of the following information do you provide to users? (tick any that apply)
X☐ *Advice about what to report* **(Bredbandsbolaget abuse report)** X☐ *Advice about how to make a report* **(Bredbandsbolaget abuse 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*
X *Law enforcement agency*
x *Other external agency* (please specify): ECPAT Sweden.....

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

Externally we always refer to ECPAT:s hotline: http://www.ecpathotline.se or the Swedish police. For internal cases (could for example be mobile phones sent to us for reparation) we have a procedure for how to handle it:

1. Take care of the original media so that it cannot be manipulated
2. Contact the Security Department
3. Write an incident report, was so detailed that the substrate can be used in a police report.
4. Forward media/equipment to the Security Department (which forwards to the relevant police unit and make a police report)
5. In the case of an email with links or images, attach the email as a file to sakerhet.se @ telenor.com

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)
X *Links to relevant child welfare organizations/specialist providers of advice* ☐ *Other confidential helplines/support services* X *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?
We implemented ECPAT: s policies into our own relevant workplace policies as a part of our agreement.

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.
This chapter is not applicable on Telenor Sweden since we don't provide content ourselves. We act as an Internet Service Provider and our efforts to protect minors and all customers is described above in the other chapters.
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?
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)

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): .....* [Please provide details including links or screenshots as relevant]
5. Please outline briefly any additional policies or activities (existing or proposed), *<u>not detailed above</u>*, to ensure that personal information is protected, using reasonable safeguards appropriate to the sensitivity of the information.

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.
Refer to self-statement.

1. Does your company provide its own *educational resources* aimed at any of the following groups?
☐ Younger children, i.e. under 13s X Teenagers <18s x Parents and carers x 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)**

x Online safe behaviour
☐ Privacy issues
x Cyberbullying
x Download and copyright issues
x 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
x 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)
X☐ Other (please specify): On websites, described above.....

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

www.surfalugnt.se
Surfa Lugnt is a public private partnership where enterprises, authorities, NGO:s join forces to increase the knowledge about young and adolescents daily digital life. The target group is parents and adults in children's presence and the vision is "active parents and adults for children's daily life on the internet".
Telenor and Bredbandsbolaget are active members since 2010.

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?

Surfa Lugnt (see above)

Since 2012 Telenor Sweden carry out a survey in the fall resulting in a report called "Child mobility report". In the report 2000 parents and children are asked about the children's usage of smartphones and surf pads. The questions revolve around e.g. regulations in the home concerning surfing and using of pads and smartphones, or where the parents turn for support in

We hope that the survey will help us to increase our understanding of consumer habits and strengthen our efforts to promote children and young people's safety online.
6. Please provide details of any partnerships with *NGO, civil society or other educational agencies* or campaigns to raise public awareness of digital safety for children and young people.
7. Please outline briefly any of your own company initiatives in *media literacy and ethical digital citizenship*, designed to help children and young people to think critically about the content consumed and created on the internet.
Telenor Surf Academy (see above)
8. Please provide details of any advice and supports *to encourage parents or teachers to talk to their children*/ pupils about the opportunities and risks arising from their use of the internet.
Surfa Lugnt Telenor Surf Academy (see above)
9. Please outline any additional activities or initiatives *not detailed above* that relate to education and awareness-raising offered by your service or product.

ANNEX

COUNTRY	PRODUCT/SERVICE	STATUS	COMMENTS
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			