



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 Norway

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

Norway

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

Mobile and fixed telephony and Internet access.

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: Robert Lundemo Aas

Position: Product Manager

Email: Robert-lundemo.aas@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?

Yes

No

Not applicable (please explain):

Telenor Norway does not provide its own content or have platforms for user generated content for social networking services.

If yes, please provide details:

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:

Telenor provides various parental control features in relation to their fixed and mobile internet services, including:

-a "Safe Child package" that allows consumers to set limits for their children's mobile use and limiting access to premium rate services(including adult content) mobile data access, MMS, etc,

-Parental control software such as Norton Family and Magic desktop allowing the use of whitelists of allowed websites or blacklists of blocked sites.

-a "Bully filter" that blocks the child's mobile from receiving messages from numbers known to send them harmful content.

-A net based filter blocking access to websites known to carry Child 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 both provides information about the included services it has to protect children online and articles on portal and in newsletters about the subject. Telenor is also participating in the campaign "Bruk Hue" reaching out to schools to educate about the potential dangers of online content.

<http://www.telenor.no/privat/kundeservice/bredbandshjelp/sikkerhet/>

<http://www.telenor.no/privat/mobil/mobiltjenester/sikkerhet/>

<http://www.online.no/sikkerhet/>

http://www.online.no/sikkerhet/trygg_paa_nett/sikre_googlesok.jsp

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

With the user terms of our services.

<http://www.telenor.no/privat/abonnementsvilkar/>

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 Norway does not have platforms for user generated content for social networking services.

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):

If yes, please identify relevant policy:

In the terms of service we warn about the potential blocking of Internet access or mail service if this is used to spread abusive material.

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.

Please 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:

-a “Safe Child package” that allows consumers to set limits for their children’s mobile use and limiting access to premium rate services(including adult content) mobile data access, MMS, etc,
-Parental control Norton Family and Magic desktop allowing the use of whitelists of allowed websites or blacklists of blocked sites.

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

“Safe Child package” for mobile subscriptions:
-blocks mobile Internet access for the mobile
-blocks premium rate services(including adult content)
-blocks listing of the user from telephone directories
-blocks MMS

Norton Family:
-logging/monitoring
-blocking of websites
-limits for time spent online
-alerts

Magic desktop:
-walled garden with access limited to a shortlist of sites

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.online.no/teknologi/magic_desktop.jsp

http://www.online.no/sikkerhet/barn_ungdom/labarnasurfe.jsp

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.

Most of this section is not relevant as we are an Internet access provider. Our user terms do anyway state that using our services to break any law or to have abusive relations towards others may lead to the termination of the access (contract).

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).

Our abuse department can be reached through mail, but as we are just an Internet access provider we are asking the users to report abusing from various sites with user generated content to the Police.

http://www.online.no/sikkerhet/barn_ungdom/barnatipserkripos.jsp

[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):

As we are an Internet service provider this would be reporting about content on sites out of our control.

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?

<p>6. Which of the following information do you provide to users? (tick any that apply)</p> <p><input checked="" type="checkbox"/> <i>Advice about what to report</i> <input checked="" type="checkbox"/> <i>Advice about how to make a report</i> <input type="checkbox"/> <i>Pre-defined categories for making a report</i> <input type="checkbox"/> <i>How reports are typically handled</i> <input type="checkbox"/> <i>Feedback to users</i> <input checked="" type="checkbox"/> <i>Other website/external agency for reporting abuse/ misuse content?</i> <input type="checkbox"/> <i>Other (please specify):</i></p> <p>We also link to the web based reporting tool of the police.</p>
<p>7. Please provide details of any <u>other means</u>, in addition to a reporting button/icon, to report content or behavior which breaches your service's terms and conditions</p> <p>Via mail to out abuse department.</p> <p>[Please provide details including links or screenshots as relevant]</p>
<p>8. Please outline briefly any other procedures or programmes offered by your service <u>not detailed above</u> that relate to abuse /misuse.</p> <p>A reporting mechanism is in the planning phase. It is designed as a bookmark and can be used with any website. The planned reporting mechanism will focus on child abuse material and will be reported directly to the Police.</p>

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.

If illegal content is reported the person reporting it is asked to report this directly to the Police.
 Abuse with the support of the compliance officer may also terminate service/access to a user before a request is received from the police.

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?

Telenor Norway is a member of the GSMA Mobile Alliance Against Child Sexual Abuse. Telenor Norway has developed a network based filter against Child Abuse Content in 2004 and has been spreading knowledge about the filter to other operators and regulators in Norway and other countries. The filter does not have a licensing fee. Please also refer to self-statement.

In 2013 Telenor Norway implemented a policy for Notice & Takedown in compliance with the GSMA recommendations and Norwegian law.

Each employee has signed a contract about relevant workplace policies.

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?

<http://www.telenor.no/om/personvern/>

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)

-The "Safe Child package" for mobile subscriptions stops information about the user from being published in Phone directories

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]
It is provided as part of the self admin interface for subscriptions.

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?

x Tips/advice to users at the point of setting privacy options

FAQs

Help or educational resources in a separate location of service

x 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

x Other (please specify): In the campaign "Bruk hue" reaching out to schools

[Please provide details including links or screenshots as relevant]

We provide advice in articles on our web portal and in newsletters

http://www.online.no/sikkerhet/barn_ungdom/barns_personvern_paa_nettet.jsp

Link to NGO with info on how to stop privacy violations.

http://www.online.no/tips_rad/paa_nett/slettmeg.jsp

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.

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.

Please 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
 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)**

- x Online safe behaviour
- x Privacy issues
- x Cyberbullying
- x 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)
- x Other (please specify): On website, in newsletters and in information campaigns in schools

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

Telenor Norway is in cooperation with the following NGOs

- <http://medietilsynet.no>
- <http://www.barnevakten.no/mobil>
- <http://www.korspahalsen.no/>

For more details pls refer to self statement.

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?

Telenor Norway is a member of the GSMA Mobile Alliance Against Child Sexual Abuse. Telenor Norway has developed a network based filter against Child Abuse Content in 2004 and has been spreading knowledge about the filter to other operators and regulators in Norway and other countries. The filter does not have a licensing fee.

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.

Telenor Norway is in cooperation with the following NGOs

<http://brukhue.com/>

<http://www.telenor.com/media/press-releases/2013/fighting-cyber-bullying-with-a-new-app/>

<http://www.barnevakten.no/mobil>

<http://www.korspahalsen.no/>

Please refer also to self-statement.

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.

The campaign “Bruk hue” teaches about how content may stay forever on the net when published and how this unintentionally may damage others. See more 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.

With the campaign “Bruk Hue” we have meeting with both teachers and parents.

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			