

TDC¹

Principles for the Safer Use of Connected Devices and Online Services by Children and Young People in the EU

Following the launch of the “Principles”, TDC (www.tdc.com) has been working in the last months to implement the provisions according to its services and products.

The Principles aimed to ensure that Signatories:

- Encourage the development of innovative approaches which enhance safe use of the technology by children and young people
- Encourage the empowerment of parents and carers to protect children and young people engaged in online activity through education and advice
- Promote users’ awareness of information and tools to help keep themselves safer online and of their obligations to behave responsibly towards other users
- Encourage the provision of easily accessible, clear and transparent information to help users understand in a timely way the conditions of use for the service they are using, including what is permitted in terms of acceptable behaviour and user-generated content
- Seek to promote users’ awareness of how – and to whom – to report abuse and concerns, including – where available – specialised external agencies and law enforcement bodies.

1. Content

The ICT Principles require under Section 1 – Content that 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 labelling
- 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

¹ www.tdc.com

- 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 whether your company plans to meet the above commitments, by providing examples on how it intends to reach the targets.

If your company has already met the above commitment, please provide evidence such as screenshots, hyperlinks etc to relevant material to support your statements

Company measure	Status: indicate if Completed, in progress or In Planning	documentation Links/ screenshot/ examples
<p>1. Mobile content is regulated through a Danish trade agreement signed by TDC. The agreement states in section 15.1 that content shall not be unsuitable for children under 16. Content is subject to ongoing and random testing by an independent and impartial unit to ensure that the premium services provided comply with the agreement and relevant legislation. Two strikes (major breaches) and the provider is out (for min. 30 days).</p>	<p>Working and continuously updated when relevant</p>	<p>The Danish Framework Agreement (online): http://www.rammeaftalen.dk/english/ Section 15 (Content): http://www.rammeaftalen.dk/english/operational-rules/15-content-provisions/ Section 4 (Supervision & Sanctions): http://www.rammeaftalen.dk/english/general-rules/4-supervision-and-sanctions/</p>
<p>2. It is possible through opt-in process including effective age-validation (18 years) to gain access to erotic/adult services. In section 18 the content is specified in relation to opt-in services etc.</p>	<p>Working and continuously updated when relevant</p>	<p>Section 15 (Opt-in): http://www.rammeaftalen.dk/english/operational-rules/15-content-provisions/ Section 18 (Adult content): http://www.rammeaftalen.dk/english/operational-rules/18-adult-content/</p>

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2. Parental controls

Signatories of the ICT Principles have committed, as relevant for their products or services, to assist parents to limit their children's exposure to potentially inappropriate content and contact. It is recognised that parental controls have limitations and cannot replace parents' engagement in their children's online use. Measures that are available or appropriate to each service/product will vary, but may include:

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

Please indicate whether your company plans to meet the above commitments, by providing examples on how it intends to reach the targets.

If your company has already met the above commitment, please provide evidence such as screenshots, hyperlinks etc to relevant material to support your statements

Company measure	Status: indicate if Completed, in progress or In Planning	documentation Links/ screenshot/ examples
1. TDC offers in its security package tools for parental control of Internet access	Working and continuously updated when relevant	http://kundeservice.tdc.dk/privat/faq.php?id=22488
2. TDC offers for subscribers to TDC TV tools for parental control either per channel or for recorded films. A default age limit can be set.	Working and continuously updated when relevant	http://kundeservice.tdc.dk/privat/faq.php?id=25199

<p>3. TDC offers a self-service, prepaid subscription aimed at children using mobile phones. Parents can choose “Mobil Junior” if they want to be protected from shock bills and protect their children from open access to mobile data/internet, payment numbers and premium services. Parents can block premium services at no cost.</p>	<p>Completed and available</p>	<p>http://privat.tdc.dk/element.php?dogtag=p_s_hopdw_mobil_o_mj</p> <p>http://kundeservice.tdc.dk/privat/fag.php?id=25305</p>
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3. Dealing with abuse/misuse

The Signatories have committed, when relevant for their services or products, to deal with all abuse/misuse related to content or conduct which may be illegal, harmful, offensive or inappropriate e.g. under a company’s Acceptable Use Policy. Signatories commit to:

- 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;
- Place links to relevant child welfare organizations or specialist providers of advice 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 whether your company plans to meet the above commitments, by providing examples on how it intends to reach the targets.

If your company has already met the above commitment, please provide evidence such as screenshots, hyperlinks etc to relevant material to support your statements

Company measure	Status: indicate if Completed, in progress or In Planning	documentation Links/ screenshot/ examples
1. See replies to section 4		
2. End users can report abuse / misuse online to TDC (anmeldelse@tdc.dk) if they find mobile content that they find offensive / violates the rules.	Completed and working	Reporting to TDC: http://kundeservice.tdc.dk/privat/faq.php?id=8430
3. TDC has included a link to the Danish child welfare organisation <i>Børns Vilkår</i> (Children's Welfare in Denmark) in an article on TDC's website about how to ensure safe use of mobile phones for children.	Completed and working	Article on TDC's website about how to ensure safe use of mobile phones for children: http://kundeservice.tdc.dk/privat/faq.php?id=11133 Link to the Danish child welfare organisation <i>Børns Vilkår</i> (Children's Welfare in Denmark): http://www.bornsvilkar.dk/Temaer/Born-medier.aspx#.UVvmeqKeNaw
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4. Child Sexual abuse content or illegal contact

Under this section, the ICT Principles require that signatories, if relevant for their services and products, cooperates with law enforcement authorities and other agencies, as provide for in local law, on child sexual abuse content or unlawful contact. The Signatories shall:

- 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 notified by national law enforcement agency
- 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.

Please indicate whether your company plans to meet the above commitments, by providing examples on how it intends to reach the targets.

If your company has already met the above commitment, please provide evidence such as screenshots, hyperlinks etc to relevant material to support your statements

Company measure	Status: indicate if Completed, in progress or In Planning	documentation Links/ screenshot/ examples
<p>1. TDC has jointly with other ISPs/telecommunication operators in co-operation with the Danish Police's operative department for IT crimes (NITES) developed a codex for handling child sexual abuse content. The codex provides guidelines to ensure that the ISPs are constantly updated with lists of relevant IP addresses from the police The police monitors traffic accessing addresses containing abusive content which then are instantly blocked by ISPs while police via Interpol if so relevant investigates hosts/sources. The work is monitored in close co-operation with the NGO 'Save the Children' and access attempt to blocked sites are referred to relevant advice by the public health services.</p>	<p>Work completed but constantly monitored and updated</p>	<p>Not public</p>
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5. Privacy and control

The Signatories have committed, when relevant for the services and products, to continue compliance with existing data protection and advertising rules and privacy rights as set out in the relevant legal dispositions. In addition, the Signatories if appropriate to their service/product, may also:

- 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 whether your company plans to meet the above commitments, by providing examples on how it intends to reach the targets.

If your company has already met the above commitment, please provide evidence such as screenshots, hyperlinks etc to relevant material to support your statements

Company measure	Status: indicate if Completed, in progress or In Planning	documentation Links/ screenshot/ examples
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6. Education and Awareness

The Signatories commit to raise awareness and provide appropriate information with the aim to:

- 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 whether your company plans to meet the above commitments, by providing examples on how it intends to reach the targets.

If your company has already met the above commitment, please provide evidence such as screenshots, hyperlinks etc to relevant material to support your statements

Company measure	Status: indicate if Completed, in progress or In Planning	documentation Links/ screenshot/ examples
<p>1. TDC has jointly with other operators in the National Telecom Industry association ('TI') as well as NGOs such as '<i>Children's Welfare</i>' and '<i>Save the Children</i>' developed materials both online and in the form of workshops for teachers that aim at increasing awareness among pupils on the safe and responsible use of the internet and social media, and initiating discussions on these subjects.</p>	<p>Has been established and is working; number of workshops have taken place</p>	<p>http://www.detdigtalespejl.dk/</p>
<p>2.TDC offers jointly with other operators in the National Telecom Industry association (TI) materials addressing schools focussing on the appropriate use of mobile phones by children to avoid harassment</p>	<p>Has been established and is working</p>	<p>http://gomobilstil.verticportals.com/</p>
<p>3.TDC and other mobile operators have agreed with the Danish Media Council for Children and Young People to raise awareness and provide information and guidance in relation to safe usage of</p>	<p>In planning (April 2013)</p>	<p>http://www.dfi.dk/Boern_og_unge/Mediaadret/The-Media-Council-for-Children-and-Young-People-in-Denmark.aspx</p>

smartphones		
4. TDC provides information on its website with advice to parents and users in general about how to ensure safe use of mobile phones for children.	Established and working	Article on TDC's website about how to ensure safe use of mobile phones for children: http://kundeservice.tdc.dk/privat/faq.php?id=11133
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