

## Implementation Questionnaire

11 October 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
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Vodafone Group Services Limited

Registered Office: Vodafone House, The Connection, Newbury, Berkshire RG14 2FN. Registered in England number 3802001

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

Czech Republic, Germany, Greece, Hungary, Ireland, Italy, Malta, Netherlands, Portugal, Romania, Spain and UK.

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

Mobile Connectivity, Fixed connectivity, Cloud Storage/Sharing Services and IPTV.

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
x Online content provider
x Online service provider
☐ Other (please specify):
5. Person(s) completing the report
Name: Paul Cardina
Name: Paul Cording
Position: Principal Consumer Policy Manager
1 osition. Trincipal consumer 1 oney Manager
Email: paul.cording@vodafone.com
provide a general section of the sec

### 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.

Vodafone no longer delivers commercial content via an in-house App store in the EU and its "live!" mobile portal is only available for legacy "feature" (non-smartphone) handsets. However it has existing policies and codes of conduct that would require it to classify commercial content. Any legacy live! services that have not been decommissioned as of November 2013 have not been included in this report however such services are covered by the existing content and access controls polices mentioned within this report. Vodafone's access and content control policies are applied as a minimum standard where there is not an existing self-regulatory code of conduct or legal framework in place. Vodafone is happy to respond to any specific queries raised on these services.

Some Vodafone markets offer an IPTV service for which its age classification and verification systems will meet national requirements. For instance the service in Germany has been approved by the Federal Commission for the Protection of Minors in the Media and is designed to meet the high standards set by German law. Vodafone Netherlands follows the standard "kijkwijzer" rating system <a href="www.kijkwijzer.nl/english">www.kijkwijzer.nl/english</a> Responses in this section refer to these IPTV services.

1. Do you provide a mechanism for consumers to <u>provide feedback, report an issue or file</u> <u>a complaint</u> about the appropriateness of a piece of content?
x Yes
$\square$ No
☐ Not applicable (please explain):
If yes, please provide details: Feedback would be via the normal customer care channels
2. Do you offer a means <u>for restricting / blocking access</u> to potentially inappropriate content for users of your service or product?
x Yes
$\square$ No
☐ Not applicable (please explain):
If yes, please provide details of mechanisms in place:
i. Germany: PIN protection system approved by the Federal Commission for the
Protection of Minors in the Media
<ul> <li>http://www.vodafone.de/tv/jugendschutz.53.0.html</li> <li>ii. Netherlands –PIN code for adult channels</li> </ul>
iii. Portugal - Offer a set of Parental Control options available in the User
Interface of the fixed IPTV service. Some of the Parental Control blocking
options available for TV are as follows:
<ul> <li>Age blocking – applicable to TV channels and Video store movies</li> </ul>
accordingly to the respective age classification
Manual/User defined list of TV channels blocked
Adult channels/content blocking
3. Do you provide any information, educational resources or advice for users in any of the
following areas?
(tick as many as apply)
x Content classification or labeling guidelines
x How to block or restrict access to content
X How to report or flag content as inappropriate
☐ Safe searching
x 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.): website <a href="http://www.vodafone.de/tv/jugendschutz.53.0.html">http://www.vodafone.de/tv/jugendschutz.53.0.html</a>

4. Where is your company's <u>Acceptable Use Policy</u> (AUP) located?
There is not currently P2P/social media interaction on the IPTV service
5. Does the AUP or separate give clear guidelines with which <u>user generated content</u> must
comply (including details about how users are expected to behave and what is not
acceptable)?
☐ Yes
$\square$ No
x Not applicable (please explain): No user generated content
If yes, please identify relevant policy:
6. Do you provide notice about the <u>consequences for users</u> if they post content which
violates terms of service or community guidelines?
□ Yes
$\square$ No
X Not applicable (please explain): No posting on IPTV
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.

Vodafone's policy is to provide its customers with the option to apply parental controls on all of its networks

- 1. Mobile the existing Group solution is a network filter with preset age profiles to be requested by the customer. The number of profiles and the default setting is decided at market level. Where Vodafone's network filtering solution may not be legally (or culturally) acceptable in a market we have developed a client-based filtering solution to run on our anti-bullying parental control App Vodafone Guardian (Product name will vary in some markets). The existing Vodafone network filter solution was implemented in 2007 and we are in the progress of upgrading the solution with a rollout that have similar capability to the one launched by Vodafone Italy earlier in the year. Rollout across the EU is targeted to be completed by March 2015. These new parental controls provide parents with the capability of tailoring profiles to suit their own child's sensitivities and/or maturity.
- 2. Fixed Vodafone is currently reviewing its policy for its fixed networks. As there have been proprietary (and generally free) PC parental control products on the market for a number of years, markets have, up until now, made local decisions on if there is a need for a solution and what that solution may be.
- 3. IPTV See content section
- 1. Please outline the availability of any <u>parental control tools and settings</u> across your product or service that allows parents to set appropriate levels of control? Include relevant links/ screenshots where available:
  - Vodafone Guardian App is available for the Android Operating System in all of Vodafone's EU markets via Google Play <a href="https://play.google.com/store/search?q=vodafone%20guardian">https://play.google.com/store/search?q=vodafone%20guardian</a>
    - In Germany and the Netherlands it is offered with JusProg's filtering lists

- 2. Mobile Network Filtering
  - Clean Pipe (2013)
    - Italy
  - Off Net Content Filter (2007)
    - Czech Republic, Greece, Hungary, Ireland, Romania, Spain and UK.
  - No network parental controls (Legal)
    - Netherlands, Germany
  - No network controls
    - Portugal, Malta (Deadline March 2015)
- 3. Fixed Network Filtering Solutions
  - Network Filtering
    - Italy
  - Client based software
    - Germany, Spain, Ireland
  - No Parental Controls offering
    - Czech Republic, Malta, Netherlands, Portugal
  - N/A

i.

- UK (no fixed consumer offering CWW acquisition of http://demon.net/ offers business solutions only)
- GR minority holding in "Hellas online" www.hol.gr
- HU No fixed offering
- RO No fixed consumer offering
- 2. If applicable, please describe the features offered by the *parental controls*? E.g. restricting web access, customization, monitoring, other restrictions.....
  - 2. Vodafone Guardian (Android handsets only)
    <a href="http://www.vodafone.com/content/parents/howto-">http://www.vodafone.com/content/parents/howto-</a>
    - guides1/set up the vodafone guardian app.html
      - ii. Can restrict the native capabilities of the device e.g. camera
      - iii. Can restrict the download of non-native applications

Can create a black list or white list of contacts

- iv. Can block data access points (Mobile Network, Wi-Fi, Bluetooth)
- v. Can apply time restrictions on total usage or block use at certain times
- vi. Germany and Netherlands versions include child, general and 18+ content filter settings supplied by JusProg
  - i. NL <a href="http://over.vodafone.nl/duurzaam/kinderen-veilig-verbinden/kind-veilig-sim">http://over.vodafone.nl/duurzaam/kinderen-veilig-verbinden/kind-veilig-sim</a>
  - ii. DE <a href="http://www.vodafone.de/privat/apps-und-fun/childprotect.html">http://www.vodafone.de/privat/apps-und-fun/childprotect.html</a>
- 3. Mobile Network Filtering (all connectivity accessing Vodafone's Mobile Network)
  - i. Clean Pipe (Italy Rete Sicura)

http://www.vodafone.it/portal/client/cms/viewCmsPage.action?pageId=183 06&menuId=12185

http://www.vodafone.it/portal/Privati/Tariffe-e-Smartphone/Servizi-e-Applicazioni/Vodafone-Rete-Sicura

- ii. Vodafone's Clean Pipe parental controls provides a number of defaulted age settings with the ability to customise those settings, to be notified of App downloads and to pre-select "quiet time" or disable "on command" to block access
- iii. Off Net Content Filter for Vodafone live!(CZ,ES,GR,HU,IE,RO & UK)
  - i. The ONCF solution provides non-customisable age categories, of "18 and over" and "under 18".
  - ii. The UK has the under 18 profile applied as a default <a href="http://www.vodafone.com/content/parents/howto-guides1/check vodafone content controls on your childs mobile.html">http://www.vodafone.com/content/parents/howto-guides1/check vodafone content controls on your childs mobile.html</a>
  - iii. The remaining markets apply the under 18 profile on request by contacting customer care

#### 4. Fixed Networks

- i. Czech Republic N/A
- ii. Germany offers a security software package that includes web browsing parental controls "Vodafone Sicherheitspaket" <a href="http://dslshop.vodafone.de/eshop/consumer/97498550/0/0/pk-hardware-und-optionen.html#DSL">http://dslshop.vodafone.de/eshop/consumer/97498550/0/0/pk-hardware-und-optionen.html#DSL</a>.
- iii. Greece -N/A
- iv. Hungary -N/A
- v. Ireland -"Vodafone PC Protection": service that offers Parental Control with other features such as Antivirus, Antispyware, Spam Control, etc. (It works like any commercial antivirus software pack on the PC).

  <a href="http://www.vodafone.ie/home-phone-broadband/add-ons">http://www.vodafone.ie/home-phone-broadband/add-ons</a>
- vi. Italy Rete Sicura <a href="http://www.vodafone.it/portal/Privati/Fibra--ADSL-e-Telefono/Tutti-i-servizi/Servizi/Vodafone-Rete-Sicura---ADSL-Vodafone">http://www.vodafone.it/portal/Privati/Fibra--ADSL-e-Telefono/Tutti-i-servizi/Servizi/Vodafone-Rete-Sicura---ADSL-Vodafone</a>
  Vodafone's Clean Pipe service that offers Parental Control with other features such as Antivirus, Antispyware, Spam Control, etc. (It works like any commercial antivirus software pack on the PC). Parental controls provides a number of defaulted age settings with the ability to customise those settings
- vii. Malta –N/A
- viii. Netherlands No
- ix. Portugal -N/A
- x. Romania –N/A
- xi. Spain "Vodafone PC Protection": service that offers Parental Control with other features such as Antivirus, Antispyware, Spam Control, etc. (It works like any commercial antivirus software pack on the PC).
- xii. UK N/A

## 3. In relation to parental controls, which of the following <u>educational and information</u> <u>resources</u> to do you offer?

(tick as many as apply)

- x 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
- x A promotional or marketing channel for the uptake of parental controls
- x External links to educational material/resources about the use of parental control
  - i. Czech Republic –
     http://pece.vodafone.cz/app/answers/list/c/133,160,207/noIntercept/1/a id/1416/s/osobni
  - ii. Germany <a href="http://www.vodafone.de/unternehmen/soziale-verantwortung/jugendschutz.html">http://www.vodafone.de/unternehmen/soziale-verantwortung/jugendschutz.html</a>
  - iii. Greece
    - http://www.vodafone.gr/portal/client/cms/viewCmsPage.action?pageId=11199
  - iv. Hungary <a href="http://www.vodafone.hu/eng/about-us/corporate-responsibility/vodafone-for-society/mobile-for-good">http://www.vodafone.hu/documents/10646/42a9771a-d73e-451a-89ad-f4da5726bc6d</a>
  - v. Ireland <a href="http://www.vodafone.ie/internet-broadband/internet-on-your-mobile/safetynet/">http://www.vodafone.ie/internet-broadband/internet-on-your-mobile/safetynet/</a>
  - vi. Italy <a href="http://corporate.vodafone.it/sostenibilita/la-sostenibilita-ambientale-e-sociale/social-apps/">http://corporate.vodafone.it/sostenibilita/la-sostenibilita-ambientale-e-sociale/social-apps/</a>
- vii. Malta www.vodafone.com.mt/safeandsecure
- viii. Netherlands <a href="http://over.vodafone.nl/duurzaam/kinderen-veilig-verbinden/kind-veilig-sim">http://over.vodafone.nl/duurzaam/kinderen-veilig-verbinden/kind-veilig-sim</a>
- ix. Portugal No
- x. Romania <a href="https://www.vodafone.ro/despre-noi/implicare-sociala/responsabilitate-corporativa/copiii-si-internetul/index.htm">https://www.vodafone.ro/despre-noi/implicare-sociala/responsabilitate-corporativa/copiii-si-internetul/index.htm</a>
- xi. Spain www.vodafone.es/padres
- xii. UK <a href="http://www.vodafone.co.uk/our-responsibilities/protecting-our-customers/customer-protection/index.htm">http://www.vodafone.co.uk/our-responsibilities/protecting-our-customers/customer-protection/index.htm</a>

4. Please outline any additional	safety tools	or solutions <u>not (</u>	<u>detailed above</u> t	hat relate to
parental controls, including any	planned imp	lementation of i	new features or	procedures?

N/A			

### 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.

Vodafone has comprehensive customer service contact points via our retail outlets, contact centres and online forums for reporting any customer issues. Vodafone's processes for handling abuse or misuse issues are predominately concerning P2P malicious calls or messaging however some EU markets do provide a Cloud storage service that has a reporting process for any content shared using that service. For telecom service providers, malicious texts or calls may originate from another Telco's network, so some remedies require the change of the victims MSISDN, or with the Vodafone Guardian App on Android devices, the capability to block the delivery of texts or calls from certain numbers.

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

**Vodafone Cloud Services** 

- Vodafone Cloud Services has the ability to share content the user is storing.
   When the user shares their content with a third party, that third party
   receives a unique reference for that notification and a contact email to report
   abuse. A report of CAM would be dealt with under the processes outlined in
   Principle 4.
- Vodafone Cloud is live in CZ (Dec 2013), DE, ES, GR, HU, IE, IT, MT, NL, RO and UK

2. Please describe the <u>process or mechanism</u> available for users to report abuse/misuse (involving images, videos, text and other content or behaviour) on your product or service). Please refer to self-statement [Please provide details including links or screenshots as relevant] 3. Where is the reporting button/ mechanism located? (tick any that apply)  $\square$  On each page of the website/service ☐ Close to the point where such content might be reported  $\square$  In a separate location such as a safety page  $\square$  In a browser extension  $\square$  In a separate app for a connected device x Other (please specify): On the notification that someone wishes to share content 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 (via customer care) x Other (please explain): Anyone who receives a share notification 5. Which kinds of content can users report? The report process allows free text 6. Which of the following information do you provide to users? (tick any that apply) ☐ Advice about what to report  $\square$  Advice about how to make a report  $\square$  Pre-defined categories for making a report ☐ How reports are typically handled ☐ Feedback to users ☐ Other website/external agency for reporting abuse/ misuse content? x Other (please specify): A unique reference id for reporting

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

Vodafone customer care channels

[Please provide details including links or screenshots as relevant]

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

Refer to self-statement

### 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.

Vodafone is a signatory of the GSMA Mobile Alliance, launched in 2007 to combat the use of mobile networks to distribute Child Abuse Material (CAM). In line with that initiative Vodafone has Notice and Action processes in place to manage any CAM found on our servers, supports the existing reporting hotlines or the setting up of a hotline in a market, and where legal to do so, implements URL block lists of websites where hotlines have been notified of CAM and is still in the process of being removed.

1. Which of the following mechanisms are provided on your product or service to <u>facilitate</u>
the notification or reporting of suspected child abuse content?
(tick any that apply)
X Company-own hotline reporting button or telephone number
X Link or button for external national or regional INHOPE hotline
☐ Emergency services
☐ Law enforcement agency
☐ Other external agency (please specify):
Vodafone will escalate a report of CAM via its normal customer care/reporting channels. For Vodafone Cloud, the notification that some one wishes to share their content with you will also provide a specific link to report abuse.
Vodafone Spain, with the other MNOs in that market launched a common reporting button ("Protect Childhood") and an Android App
<ul> <li>The button allows any user to report anonymously, in a simple and direct way, child sexual abuse images that could be found browsing internet</li> </ul>
(connected to Spanish hotline and helpline promoted by the European Commission: Protégeles; www.protegeles.com)
2. Please outline briefly the procedures to be followed if illegal content were to be discovered on your service.
The legal frameworks and subsequent relationships between LEAs/Hotlines and govt.
Internal affairs departments will vary to some extent on a market by market basis however
as a template the following processes are in place
CAM discovered by Vodafone
<ul> <li>If CAM was discovered by Vodafone, the Fraud &amp; Security team would be</li> </ul>
notified, who in turn would notify LEA. Dependent on LEA request and the
legal requirements, the content would be removed or quarantined to enable
investigation
2. CAM discovery notified by Public

- Notification via call centre/online will be escalated to the Fraud & Security team, who in turn would notify LEA. Dependent on LEA request and the legal requirements, the content would be removed or quarantined to enable investigation
- 3. CAM discovery notified by LEA
  - LEA notification would come in directly to Fraud & Security department.
     Dependent on LEA request and the legal requirements, the content would be removed or quarantined to enable investigation
- 4. CAM discovery notified by Hotline
  - Hotline notification would come in directly to Fraud & Security department.
     Dependent on LEA request and the legal requirements, the content would be removed or quarantined to enable investigation

3. Do you provide links to any of the following to enable users gain <u>additional information</u>					
in relation to child sexual abuse content or illegal contact?					
(tick any that apply)					
$\square$ Links to relevant child welfare organizations/specialist providers of advice					
$\square$ Other confidential helplines/support services					
$\square$ Law enforcement agencies					
□ INHOPE					
☐ Other (please specify):					
<ul> <li>Czech Republic - <a href="http://www.iwf.org.uk/">http://www.iwf.org.uk/</a> and <a href="http://oznamte.internethotline.cz/">http://www.iwf.org.uk/</a> and <a href="http://oznamte.internethotline.cz/">http://oznamte.internethotline.cz/</a></li> </ul>					
<ul> <li>Germany – <u>www.fsm.de</u></li> </ul>					
Greece -					
http://www.vodafone.gr/portal/client/cms/viewCmsPage.action?lang=en_EN&requ					
est locale=en&pageId=10628					
Hungary - No					
• Ireland -http://www.vodafone.ie/aboutus/code/carepolicies/illegal/ to www.hotline.ie.					
<ul> <li>Italy – No (Website update being planned)</li> </ul>					
Malta - No					
<ul> <li>Netherlands – <a href="http://www.vodafone.nl/kinderen">http://www.vodafone.nl/kinderen</a></li> </ul>					
Portugal - No					
<ul> <li>Romania - <a href="https://www.vodafone.ro/despre-noi/implicare-sociala/responsabilitate-">https://www.vodafone.ro/despre-noi/implicare-sociala/responsabilitate-</a></li> </ul>					
corporativa/numarul-de-urgenta-116000/index.htm					
<ul> <li>Spain - <a href="http://www.vodafone.es/conocenos/es/vodafone-">http://www.vodafone.es/conocenos/es/vodafone-</a></li> </ul>					
espana/sostenibilidad/comportamiento-etico-y-responsable/uso-					
responsable/decalogo-para-padres-y-otros-recursos/					
<ul> <li>UK - <a href="http://www.vodafone.com/content/parents/howto-">http://www.vodafone.com/content/parents/howto-</a></li> </ul>					
guides1/report online child sexual abuse content to the IWF.html					
4. Please outline briefly any additional procedure in place within your company <u>not</u>					
<u>detailed above</u> to ensure that you comply with local and/ or international laws with					
regard to child sexual abuse and other illegal content?					
As full members of the IWF, Vodafone has a licence that allows the use of, where legal to do					
so, the IWF block list in territories outside of the UK					

### 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 G	roup/Corpora	ite level ai	າd if yoເ
have different s	olutions in EU N	/larket.				

Vodafone does not offer a social networking service or in-house App store however it has existing policies and code of conduct that would require it to provide separate default privacy settings for younger users. Vodafone does not actively identity children for marketing purposes and any known children's data is flagged and excluded from marketing campaigns however we have included links, where appropriate, to confirm our position.

1. Please provide details of your company's published <u>privacy policy</u> 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.vodafone.com/content/index/about/about-us/privacy/privacy_by_design.html
2. Are <u>distinct privacy settings</u> deployed to prevent access to information on for users
under the age of 18?
□ Yes
$\square$ No
X Not applicable (please explain): Please see approach statement
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 <u>age category</u> of under 18s, as relevant:
Please identify any steps you have taken to ensure that these settings are <u>easy to</u> <u>understand, prominently placed, user friendly and accessible</u> .

3. Where are users able to view and change or update their privacy status?
tick any that apply)
$\square$ On each page of the website/service
$\square$ At each point where content may be posted
$\square$ In separate location such as a settings/safety/privacy page
$\square$ In a browser extension
$\square$ 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 <u>information, resources or help features</u> (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
$\Box$ Help or educational resources in a separate location of service
$\Box$ Links to any external NGO agencies offering education or awareness-raising related to
privacy
$\Box$ Links to governmental or EC agencies (Office of Data Protection Commissioner, ENISA etc.) in relation to privacy and data protection
☐ Other (please specify):
Girler (prease specify).
[Please provide details including links or screenshots as relevant]
5. Please outline briefly any additional policies or activities (existing or proposed), <u>not</u>
detailed above, to ensure that personal information is protected, using reasonable
safeguards appropriate to the sensitivity of the information.  www.gsma.com/publicpolicy/mobile-and-privacy/design-guidelines
www.gsma.com/publicpolicy/mobile-and-privacy/design-guidennes

### 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.

Vodafone started delivery educational and awareness collateral in 2005, coinciding with the launch of the world's first mobile network parental controls solution in the UK. Vodafone Group launched its Digital Parenting initiative in 2009 and works with our individual markets to roll out or adapt appropriate elements of that initiative within their markets, to support development of independent local initiatives and to aid the sharing of best practice across our markets. Relationships with schools, NGOs and government departments will vary from market to market and therefore there will be a variance in approaches across our markets however the principle is to support parents to enable them to make informed decisions on advising and protecting their children online. This involves making them aware of the tools available and providing insight to views of other parents and parenting specialists on the approaches to online safety

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

## 2. Which of the following <u>topics</u> 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
- x Safe use of mobile phones
- x Contact with strangers
- x Other topics (please specify) ....see <a href="https://www.vodafone.com/parents">www.vodafone.com/parents</a>

## 3. With reference to any educational material you provide, <u>which of the following</u> <u>methods do you use</u>?

#### (tick any as apply)

- X Documentation provided with product/contract on purchase/first registration
- ☐ A required presentation by salesperson completing sale
- ☐ Displays/leaflets positioned prominently in stores
- x Notification by email / on-screen statement / other means when product or contract is purchased or first registered
- X Prominent notifications, resources or pop ups on website
- ☐ Helpdesk (telephone or online)
- X Other (please specify): Material is predominately on website
  - Czech Republic
    - http://pece.vodafone.cz/app/answers/list/c/133,160,207/noIntercept/1/a\_id/1416/s/osobni
  - Germany <a href="http://www.vodafone.de/unternehmen/soziale-verantwortung/jugendschutz.html">http://www.vodafone.de/unternehmen/soziale-verantwortung/jugendschutz.html</a>
  - Greece
    - http://www.vodafone.gr/portal/bsafeonline?request\_locale=en&lang=en\_EN\_
  - Hungary <a href="http://www.vodafone.hu/eng/about-us/corporate-responsibility/vodafone-for-society/mobile-for-good">http://www.vodafone.hu/eng/about-us/corporate-responsibility/vodafone-for-society/mobile-for-good</a>
  - Ireland <a href="http://www.vodafone.ie/internet-broadband/internet-on-your-mobile/safetynet/">http://www.vodafone.ie/internet-broadband/internet-on-your-mobile/safetynet/</a>
  - Italy No (site update being planned)
  - Malta https://www.vodafone.com.mt/safeandsecure
  - Netherlands <a href="http://over.vodafone.nl/duurzaam/kinderen-veilig-verbinden/">http://over.vodafone.nl/duurzaam/kinderen-veilig-verbinden/</a>
  - Portugal <a href="http://pais.vodafone.pt">http://pais.vodafone.pt</a>
  - Romania <a href="https://www.vodafone.ro/personal/servicii-si-tarife/servicii-si-aplicatii/aplicatii-si-jocuri/#tab-4">https://www.vodafone.ro/personal/servicii-si-tarife/servicii-si-aplicatii/aplicatii-si-jocuri/#tab-4</a>
  - Spain <u>www.vodafone.es/padres</u>
  - UK www.vodafone.com/parents

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

- Czech Republic -No
- Germany <a href="http://www.vodafone.de/unternehmen/soziale-verantwortung/jugendschutz.html">http://www.vodafone.de/unternehmen/soziale-verantwortung/jugendschutz.html</a>
- Greece
  - http://www.vodafone.gr/portal/bsafeonline?request\_locale=en&lang=en\_EN\_
- Hungary <a href="http://www.vodafone.hu/documents/10646/42a9771a-d73e-451a-89ad-f4da5726bc6d">http://www.vodafone.hu/documents/10646/42a9771a-d73e-451a-89ad-f4da5726bc6d</a>
  - o www.mte.hu
  - o www.baratsagosinternet.hu
  - o www.minimax.hu
  - o www.egyszervolt.hu
- Ireland <a href="http://www.vodafone.ie/aboutus/code/carepolicies/illegal/">http://www.vodafone.ie/aboutus/code/carepolicies/illegal/</a>
  - o http://www.ispai.ie/
- Italy No (Site update being planned)
- Malta -No
- Netherlands <a href="http://over.vodafone.nl/duurzaam/kinderen-veilig-verbinde">http://over.vodafone.nl/duurzaam/kinderen-veilig-verbinde</a>n/partners
- Portugal <a href="http://www.seguranet.pt">http://www.seguranet.pt</a>
- Romania <u>www.sigur.info</u>
- Spain <a href="http://www.vodafone.es/conocenos/es/vodafone-espana/sostenibilidad/comportamiento-etico-y-responsable/uso-responsable/decalogo-para-padres-y-otros-recursos/">http://www.vodafone.es/conocenos/es/vodafone-espana/sostenibilidad/comportamiento-etico-y-responsable/uso-responsable/decalogo-para-padres-y-otros-recursos/</a>
- UK
  - o www.parents.vodafone.com

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

Digital Facts of Life "Web Super Skills" Moshi Monster cards launched in Ireland, Spain and UK November 2013. Aimed at parents with children between the ages of 4 and 8, the cards purpose is as a discussion starter with simple messages for parents to talk to their children about. Working Mind Candy ensured that children of that age will find the experience engaging. The cards are available within Vodafone stores to customers but also available as a downloadable pdf to schools <a href="http://vodafone-toolkit.co.uk/moshi-web-super-skills/">http://vodafone-toolkit.co.uk/moshi-web-super-skills/</a>

6. Please provide details of any partnerships with <u>NGO, civil society or other educational</u> <u>agencies</u> or campaigns to raise public awareness of digital safety for children and young people.

- Czech Republic
  - o <a href="http://www.ebezpeci.cz">http://www.ebezpeci.cz</a>
- Germany
  - o FSM
  - JusProg
- Greece
  - o Hellenic Association for the study of Internet Addiction Disorder
  - o Greek Society of Social Paediatrics and Health Promotion
- Hungary –In discusions
- Ireland No
- Italy –No (Site update being planned)
- Malta -No
- Netherlands
  - Stichting Wee twat je besteedt (Know your money)
  - o De Kindertelefoon www.kindertelefoon.nl
- Portugal
  - o http://www.seguranet.pt
- Romania
  - o www.Sigur.info
- Spain
  - o www.Protegeles.es
- UK
  - www.theParentZone.co.uk
  - o www.IWF.org
- Vodafone Group
  - Family Online Safety Institute www.fosi.org
  - o Parent Zone www.theparentzone.co.uk
- 7. Please outline briefly any of your own company initiatives in <u>media literacy and ethical</u> <u>digital citizenship</u>, designed to help children and young people to think critically about the content consumed and created on the internet.
- 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.

Please see answers to Questions 5 & 6

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.