

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

Implementing Measures by Deutsche Telekom Group January 2013

Following the launch of the “Principles”, **Deutsche Telekom** has been working to implement the provisions according to its services and/or 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.

General remarks by Deutsche Telekom

- By taking the following steps, Deutsche Telekom builds on its engagement of the recent years and continuously takes on responsibility for own services and products within the ICT sector.
- Deutsche Telekom’s earlier international commitments to improve child safety are the European Framework for Safer Mobile Use by Younger Teenagers and Children, the Mobile Alliance against Child Sexual Abuse Content, and TeachToday.eu.
- Various additional commitments have been undertaken by Deutsche Telekom Group’s subsidiaries on national level too.
- Each of the measures of this new commitment will be implemented in the services and products of each of Deutsche Telekom's subsidiaries in the EU until January 2014.
- The implementation will be undertaken in good faith to meet specific cultural preferences, different technologies and considering the companies' varying service and product portfolios as well as already established safeguards.

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
- 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.

Company measure	Status: indicate if Completed, in progress or In Planning	documentation Links/ screenshot/ examples
Classification rules for digital content differ widely between the different EU Member States and, accordingly, Deutsche Telekom's subsidiaries apply different classification schemes in different geographical markets. To establish a common minimum standard, Deutsche Telekom commits to:		
<ul style="list-style-type: none"> • Classification of commercial own and third party content on own digital content platforms in at least two categories: suitable for all age groups and suitable only for adults. 		
<ul style="list-style-type: none"> • Higher granularity (e. g. 16+, 12+) is applied in some markets, according to national standards in other media. 		

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.

Company measure	Status: indicate if Completed, in progress or In Planning	documentation Links/ screenshot/ examples
By providing Internet access services Deutsche Telekom cannot control or assume responsibility for content available over the open Internet. To assist parents and carers, Deutsche Telekom is however committed to provide customers with tools that allow parents to accommodate Internet usage to the needs of their children:		
<ul style="list-style-type: none"> • Offering a service for mobile Internet access via Smartphones allowing customers to filter inappropriate content from open Internet resources and/ or limit the usage of child safety relevant services. 		
<ul style="list-style-type: none"> • Additionally, Deutsche Telekom offers a child safety price plan in mobile communications, which allows customers to block internet access. 		
<ul style="list-style-type: none"> • For fixed Internet access, a service is offered allowing customers to filter inappropriate content from open Internet resources. 		
<ul style="list-style-type: none"> • On own digital content platforms adult erotic content is only offered if age verification mechanisms are applied to prevent access by minors. 		

<ul style="list-style-type: none"> To improve the awareness on availability and to help increasing the usage of parental control tools, measures listed above are offered via e-channels and promoted on companies' Child Online Safety Webpage. 		
<ul style="list-style-type: none"> Information on parental control tools is made available with own-branded product information when purchased by customers. 		

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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.

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<p>Deutsche Telekom commits to provide reporting tools for users in all services that may contain harmful or inappropriate content, as defined in the service's terms. Accordingly, this commitment refers to post-/un-moderated consumer hosting services allowing users to share their uploaded content publicly or with a limited audience.</p>		

<ul style="list-style-type: none"> For the use of consumer hosting services, customers have to agree with the terms of service. The terms set out which content and behaviour is allowed on the relevant services and/ or which not. 		
<ul style="list-style-type: none"> In line with this, all respective consumer cloud and hosting services include an online reporting tool allowing users to report inappropriate content on this service. 		
<ul style="list-style-type: none"> The reporting tool shall be easy-to-use and easy-to-find via a link or button on the site. 		
<ul style="list-style-type: none"> The reporting tool must not allow anonymous reports but at least require providing the email address. 		
<ul style="list-style-type: none"> Complaining User will receive an automatic response. The automatic reply should include: a description of the investigation process, reference to the terms of service and standard times of dealing with the complaint. The means of response can be email, the messaging function within the service or other. 		
<ul style="list-style-type: none"> These measures are based on effective internal processes with clear responsibilities and standard processes, which ensure that complaints are dealt with in a short timeframe. 		

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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.

Company measure	Status: indicate if Completed, in progress or In Planning	documentation Links/ screenshot/ examples
<p>The GSMA Mobile Alliance against Child Sexual Abuse Content⁷ sets out standards for mobile services on how to effectively fight child sexual abuse material online. In order to share the good practice of these standards, Deutsche Telekom worked jointly with other operators to publish the GSMA Transparency Paper⁸. Deutsche Telekom commits to the following standards to ensure effective takedown of child abuse material:</p>		
<ul style="list-style-type: none"> The corporate Child Online Safety Webpage provides links to the INHOPE reporting app, which enables users to report child abuse material via their Smartphone. 		
<ul style="list-style-type: none"> Corporate web pages provide the link to the national INHOPE node or equivalent for user reports on suspected child sexual abuse content online. 		
<ul style="list-style-type: none"> Deutsche Telekom supports the work of the INHOPE node or equivalent in the respective country. 		
<ul style="list-style-type: none"> There are clear internal processes and responsibilities in Deutsche Telekom, to ensure that reports received on child sexual abuse material online are appropriately dealt with. Such reports should not be investigated by own staff. 		
<ul style="list-style-type: none"> Deutsche Telekom cooperates with law enforcement and INHOPE or equivalent in the fight against child sexual abuse material online, in order to facilitate prompt prosecution and law enforcement regarding suspected content brought to the company's acknowledgement. 		
<ul style="list-style-type: none"> For own consumer hosting or digital content platforms, liaison points of contact with law enforcement and INHOPE or equivalent are ensured, in order to receive their reports on identified child sexual abuse content on own services. 		

<ul style="list-style-type: none"> Contractual agreements are used to require 3rd party content providers/ partners with whom there are commercial relationship to follow equivalent notice and takedown rules. 		
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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.

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<p>Deutsche Telekom is committed to improve age appropriate privacy settings through implementing the GSMA 'Privacy Design Guidelines for Mobile Application Development' (www.gsma.com/publicpolicy/privacy-design-guidelines-for-mobile-application-development).</p> <p>The guidelines had been developed in the context of the GSMA Mobile Privacy Initiative⁶ and help to drive a more consistent approach to user privacy across mobile platforms, applications and devices.</p> <p>They establish privacy rules for e.g. social networking and social media apps, or the application of mobile</p>		

<p>advertisement. In a dedicated chapter on children and adolescent, the principles demand to, inter alia, tailor applications to appropriate age ranges and to have a location default setting that prevents users from automatically publishing their precise location.</p> <p>The guidelines will be implemented in each of Deutsche Telekom's subsidiaries.</p>		
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6. Education and Awareness

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

- a. 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;
- b. 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;
- c. Provide links to other sources of relevant, independent and authoritative advice for parents and carers, teachers, and for children;
- d. 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;
- e. 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.

Company measure	Status: indicate if Completed, in progress or In Planning	documentation Links/ screenshot/ examples
<ul style="list-style-type: none"> • To improve transparency and demonstrate responsibility, each national entity will appoint a Child Safety Officer. This officer is coordinating child online safety internally and serves as a central point of contact for external requests, e.g. by non-governmental organisations and authorities. 		
<ul style="list-style-type: none"> • For better information of the public and stakeholders, all national companies will provide a dedicated Child Online Safety Webpage as easy to reach and central hub for parents, kids and interested stakeholders. This 		

<p>Deutsche Telekom's subsidiaries are continuously engaging in a variety of different projects to further education and awareness in the context of the respective national culture and education systems. Such initiatives include inter alia:</p> <ul style="list-style-type: none"> • Running own public campaigns and events • Provisioning of awareness raising material • Support of governmental initiatives • Support of NGOs engaged in the field • Facilitating the work of schools and teachers 		