



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:

TDC

www.tdc.com

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

TDC is a full scale provider of telecom services for business and residential customers in Denmark and thus addresses the residential market for telecommunication and TV services in Denmark on all platforms: fixed, mobile and CATV networks

TDC also operates on the markets for business customers in Norway, Sweden and Finland

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

Provision of mobile and fixed telephony services; broadband/Internet services on mobile, fixed platforms included triple play bundled services (IPTV), CATV services

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: **Allan Bartroff**.....

Position: **Senior Advisor, Public Affairs**.....

Email: **abar@tdc.dk**.....

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.

N/A

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):

TDC is mainly a provider of communication services, i.e. TDC is not in a position to assess the content (with the exception of specified mobile content services or services identified by the appropriate authorities)

However, end users can report abuse / misuse online to TDC (anmeldelse@tdc.dk) if they find mobile content that they find offensive or which violates the rules.

If yes, please provide details:

Reporting to TDC:

<http://kundeservice.tdc.dk/privat/faq.php?id=8430> (anmeldelse@tdc.dk)

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:

Mobile content is regulated through a Danish trade agreement (by the Danish Telecom Industry Association (Teleindustrien, TI) 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). For mobile services it is possible through opt-in processes including effective age-validation (18 years) to gain access to erotic/adult services. In section 18 of the common agreement the content is specified in relation to opt-in services etc.

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/>

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.):

Please, see next chapter on parental control as well as previous 2

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

In contracts with consumers (§9);

http://download.tdc.dk/pub/tdc/privat/samlet_vilkaar/privat/tjenester_abonnement/bb/hovedvilkaar/bredbaand.pdf

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):

TDC does not provide platforms for user generated content

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:

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.

**TDC offers various tools for parental control.
Only relevant in the Danish residential market**

1. Please outline the availability of any *parental control tools and settings* across your product or service that allows parents to set appropriate levels of control? Include relevant links/ screenshots where available:

TDC offers in its security package tools for parental control of Internet access:

<http://kundeservice.tdc.dk/privat/faq.php?id=22488>

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:

<http://kundeservice.tdc.dk/privat/faq.php?id=25199>

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.

http://privat.tdc.dk/element.php?dogtag=p_shopdw_mobil_o_mj

<http://kundeservice.tdc.dk/privat/faq.php?id=25305>

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

Please see previous answer (1)

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

It is included in the information accompanying the parental control tools see previous section 1.

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?

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.

N/A

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.

End users can report abuse / misuse online to TDC (anmeldelse@tdc.dk) if they find mobile content that they find offensive / violates the rules.

<http://kundeservice.tdc.dk/privat/faq.php?id=8430>

TDC has included a link to the Danish child welfare organisation *Børns Vilkår* (Children's Welfare in Denmark) in an article on TDC's website about how to ensure safe use of mobile phones for children:

<http://www.bornsvilkar.dk/Temaer/Born-medier.aspx#UVvmeqKeNaw>

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).

Please, see section 1 above

[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*
- Other (please specify):*

TDC does not provide 'reporting buttons' as the existing reporting mechanisms and the co-operation with NGOs and the authorities seems to be sufficient bearing in mind that TDC cannot assess content as such

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?*
- Everyone including non-users, e.g. parents/teachers who are not registered for the service*
- Other (please explain):*

N/A

<p>5. Which <i>kinds of content</i> can users report?</p>
<p>All types of potentially abusive or illegal content</p>
<p>6. Which of the following information do you provide to users? (tick any that apply)</p>
<p><input type="checkbox"/> <i>Advice about what to report</i> <input 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 type="checkbox"/> <i>Other website/external agency for reporting abuse/ misuse content?</i> <input type="checkbox"/> <i>Other (please specify):</i></p> <p>N/A</p>
<p>7. Please provide details of any <i>other means</i>, in addition to a reporting button/icon, to report content or behaviour which breaches your service's terms and conditions</p>
<p>N/A</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 <i>not detailed above</i> that relate to abuse /misuse.</p>
<p>N/A</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.

See answer in section 2 below

1. Which of the following mechanisms are provided on your product or service to *facilitate the notification or reporting* of suspected child abuse content?

(tick any that apply)

- Company-own hotline reporting button or telephone number*
- Link or button for external national or regional INHOPE hotline*
- Emergency services*

X *Law enforcement agency*

Other external agency (please specify):

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

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 relevant - investigates hosts/sources. The work is monitored in close co-operation with the NGO 'Save the Children' and access attempts to blocked sites are referred to relevant advice by the public health services.

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?

N/A

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.

N/A

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?

N/A

2. Are distinct privacy settings deployed to prevent access to information on for users under the age of 18?

- Yes
- No

X *Not applicable (please explain):*

TDC is a communication service provider and thus complies with the regulation on e-communication privacy

If yes, please briefly outline available age-appropriate privacy settings (Provide details including relevant links/ screenshots on your website)

Please identify default settings for each age category of under 18s, as relevant:

Please identify any steps you have taken to ensure that these settings are easy to understand, prominently placed, user friendly and accessible.

3. Where are users able to view and change or update their privacy status? tick any that apply)

- On each page of the website/service*
- At each point where content may be posted*
- In separate location such as a settings/safety/privacy page*
- In a browser extension*
- In a separate app for a connected device*
- Other (please specify):*

N/A

[Please provide details including links or screenshots as relevant]

4. Which of the following *information, resources or help features* (if any) are provided to encourage users to make informed decisions about their privacy or the information they share?

- Tips/advice to users at the point of setting privacy options*
- FAQs*
- Help or educational resources in a separate location of service*
- Links to any external NGO agencies offering education or awareness-raising related to privacy*
- Links to governmental or EC agencies (Office of Data Protection Commissioner, ENISA etc.) in relation to privacy and data protection*
- Other (please specify):*

Except for children (see section 6) no specific features are provided, as TDC is complying with on various rules on e-communication privacy including rules cookies etc.

[Please provide details including links or screenshots as relevant]

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.

N/A

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.

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.

See below 1

N.a.

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):

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. TDC as well informs on its website on children's use of online identity, social media, etc.:

<http://kundeservice.tdc.dk/privat/faq.php?id=11133>

<http://tdc.dk/nu/publish.php?id=33995>

2. Which of the following *topics* are included within your own company educational materials?

(tick any that apply)

- Online safe behaviour
- Privacy issues
- Cyberbullying
- 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)
- Other (please specify):

Please see section 5 below

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

Please see section 5 below

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?

TDC has jointly with other operators in the National Telecom Industry association ('TI') as well as NGOs such as '*Children's Welfare*' and '*Save the Children*' 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

<http://www.detdigitalespejl.dk/>

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

<http://gomobilstil.verticportals.com/>

TDC and other mobile operators have together with the Danish Media Council for Children and Young People launched an online parental guide to raise awareness and provide information and guidance in relation to safe usage of smartphones for 9 to 12 year old children:

http://www.dfi.dk/ftp/Foraeldreguiden/index_ie8.html

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.

Please see section 5 above

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.

Please see section 5 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.

Please see section 5 above

9. Please outline any additional activities or initiatives *not detailed above* that relate to education and awareness-raising offered by your service or product.

N/A

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			