



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:

TeliaSonera

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

Finland, Sweden, Denmark, Estonia, Latvia, Lithuania and Spain.

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

TeliaSonera Internet Security Services
Child SafeGuard provided by NetClean, with TeliaSonera as subcontractor
TeliaSonera IPTV, CableTV and terrestrialTV

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: Juha Luopa.....

Position: Product Manager.....

Email: juha.luopa@teliasonera.com.....

Principle 1 – Content

Commitments

Signatories should:

- Indicate clearly where a service they offer may include content considered not to be appropriate for children and display prominently options which are available to control access to the content. This could include, where appropriate for the service, tools to manage access to certain content, advice to users or a recognised system of content labeling.
- Display prominently and in an easily accessible location the Acceptable Use Policy, which should be written in easily-understandable language.
- State clearly any relevant terms of service or community guidelines (i.e. how users are expected to behave and what is not acceptable) with which user generated content must comply.
- Ensure that reporting options are in the relevant areas of the service.
- Provide notice about the consequences for users if they post content which violates terms of service or community guidelines.
- Continue work to provide innovative solutions able to support child safety protection tools and solutions.

Please indicate, when relevant, the approach taken at Group/Corporate level and if you have different solutions in EU Market.

TeliaSonera does not provide own content, platforms for user generated content or social networking services. As a distributor of third party professional content, TeliaSonera ensures, through its contracts with content providers, that the content is classified according to the applicable content classification requirements.

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):

TeliaSonera's commitment is to classify apps according to well-established content classification systems, provide consumers the possibility to provide feedback and promote the CEO Coalition's general approach to the classification of apps.

If yes, please provide details:

2. Do you offer a means *for restricting / blocking access* to potentially inappropriate content for users of your service or product?

- Yes
- No
- Not applicable* (please explain): The third-party professional content which TeliaSonera currently distributes is age-rated according to the applicable content classification requirements.

In Finland, Sweden, Norway and Denmark, according to Act on Audiovisual Programs, all programs are classified with a certain age limit, depending on the program's content, and are to be given a symbol that describes the detrimental content of the program. If there is no reason to consider the program to be detrimental to the development of children, it shall be classified as suitable for all ages. This is applicable for TeliaSonera IPTV, CableTV and terrestrialTV content.

If yes, please provide details of mechanisms in place:

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.):

TeliaSonera is offering client based parental controls to its consumer customers and improving the customer communication and guidance how to use parental controls in terms of safe searching, blocking or restricting access to inappropriate content.

In addition, TeliaSonera IPTV service in Finland, Sweden, Denmark and Estonia includes parental control feature, set by a pin code. Parental control is blocking adult content from channels and rental videos as well as is capable to lock programmed recordings.

Moreover, TeliaSonera has internal instruction on erotic content and child sexual abuse material.

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

<http://www.sonera.fi/toimitusehdot+ja+palvelukuvaukset>
<http://www.telia.se/privat/villkor/>
<https://www.elion.ee/elion/lepingud-ja-tingimused#tootetingimused>
<http://telia.dk/omtelia/betingelser>

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): TeliaSonera does not provide own content or 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): TeliaSonera does not provide own content or platforms for user generated content.

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.

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:

TeliaSonera is providing parental controls to its broadband and mobile customers. TeliaSonera Desktop and Mobile security service by F-Secure, offered to consumer customers, contain parental control features and web browsing protection for PC/Mac and mobile devices. TeliaSonera offers such service in Sweden, Finland and Estonia.

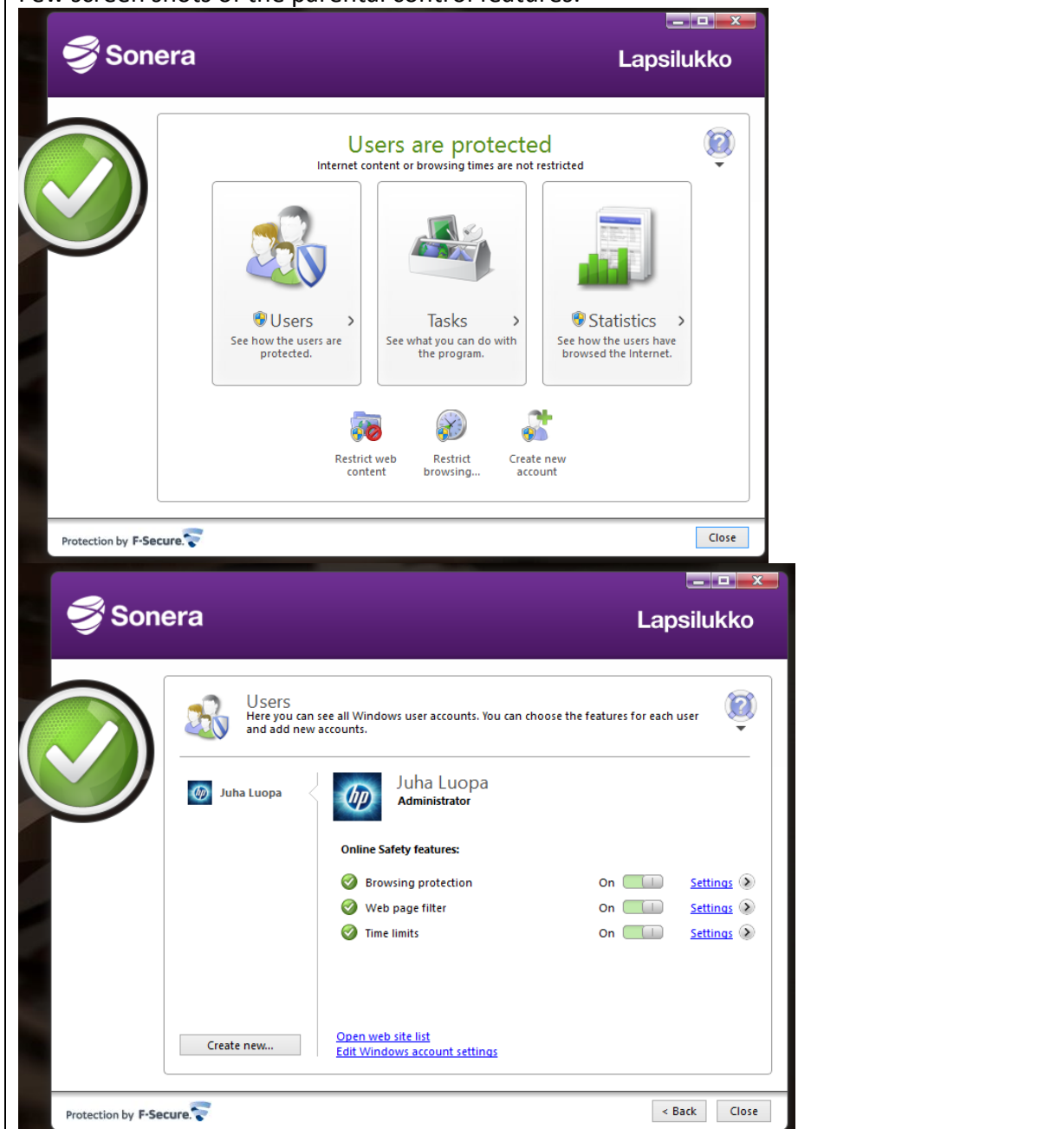
Finnish link: <http://www.sonera.fi/tutustu+ja+osta/lisapalvelut/tietoturvapalvelut/>
Swedish link: <http://www.telia.se/privat/bredband/tjanster/produkt/telia-saker-surf-fast>
Estonian link: <https://www.elion.ee/eraklient/internet/arvutikaitse>

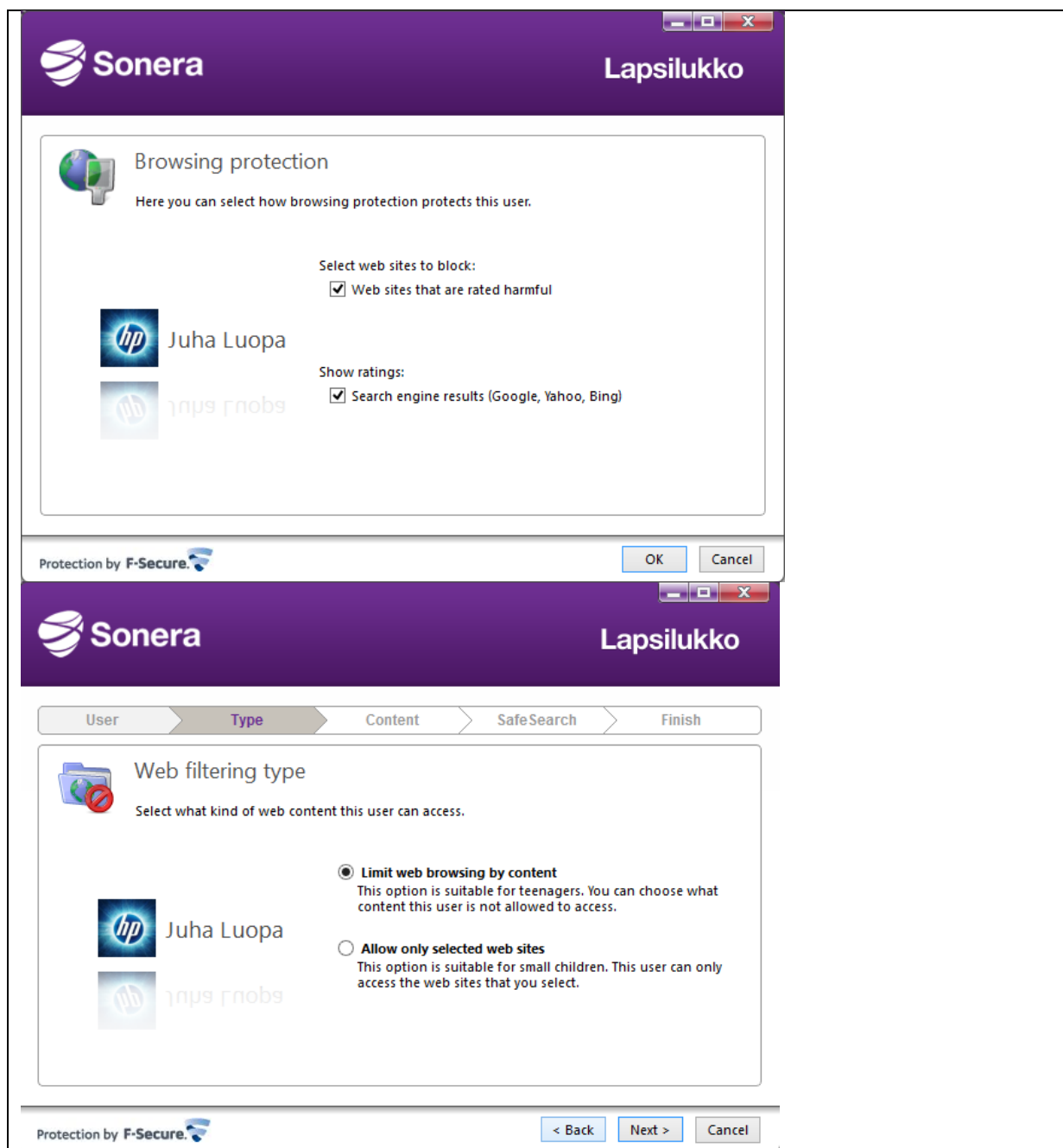
In addition TeliaSonera IPTV service in Finland, Sweden, Denmark and Estonia includes parental control feature, set by a pin code. Parental control is blocking adult content from channels and rental videos as well as is capable to lock programmed recordings.

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

Parental controls is part of the TeliaSonera internet security client and include the ability to create unique profiles for numerous users by creating different age profiles and customize them to block or allow certain types of sites based on certain preferences (filter out unwanted content) as well to set time restrictions for browsing.

Few screen shots of the parental control features:





Sonera
Lapsilukko

User
Type
Content
Safe Search
Finish

Restrict web content

Select the content that you want to block for this user.

Juha Luopa

<input checked="" type="checkbox"/> Weapons	<input type="checkbox"/> Forums
<input checked="" type="checkbox"/> Violence	<input type="checkbox"/> Social networks
<input checked="" type="checkbox"/> Cults	<input type="checkbox"/> Blogs
<input checked="" type="checkbox"/> Drugs	<input type="checkbox"/> Illegal downloads
<input checked="" type="checkbox"/> Gambling	<input type="checkbox"/> Anonymizers
<input checked="" type="checkbox"/> Adult	<input type="checkbox"/> Unrated Content
<input checked="" type="checkbox"/> Dating	

Protection by F-Secure
< Back
Next >
Cancel

Sonera
Lapsilukko

User
Time of day
Amount
Finish

Select the allowed browsing hours

Mark the times when this user can browse the Internet. Browsing the Internet is not allowed at any other time.

Juha Luopa

Allow web browsing during these hours:

	Mon	Tue	Wed	Thu	Fri	Sat	Sun		
	■	■	■	■	■	■	■	■	■

■ = Allow = Block

Protection by F-Secure
< Back
Next >
Cancel

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*

TeliaSonera is working to increase the visibility and awareness of parental controls by different marketing efforts and support the take-up by improving editorial level in TeliaSonera webpages and providing tips&tricks for installation and use of parental controls.

Example from Estonia, where a Elion published an article in (DigiSmart):

<http://www.digitark.ee/pariselt-ka-voi-ehk-kuidas-nutitelefone-targasti-kasutada/> as a promotion of the site <http://www.pariseltkavoi.ee/> where parents and youth can find tips and read more about internet threats.

Example from Finland,

[http:// www.sonera.fi/lapset](http://www.sonera.fi/lapset) where Sonera promotes safe mobile and internet use for children and parents.

Example from Sweden

<http://www.telia.se/privat/support/mobilabonnemang/foraldrakontroll>, where Telia give guidance how to set-up parental controls in mobile phone.

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?

TeliaSonera is looking at the ways to enhance and improve parental control service by implementing parental controls on more devices, independent of the accessed network and offering the service in additional geographies.

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.

TeliaSonera doesn't provide own content or platforms for user generated content and therefore hasn't relation to dealing with such abuse.

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.

TeliaSonera general service terms include company policy regarding the misuse in the TeliaSonera networks

<http://www.sonera.fi/toimitusehdot+ja+palvelukuvaukset>

<http://www.telia.se/privat/villkor/>

<https://www.elion.ee/elion/lepingud-ja-tingimused#tootetingimused>

<http://telia.dk/omtelia/betingelser>

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).

Telia customers in Sweden can report abuse of internet services within Telia's range
http://www.telia.se/privat/abuse/report_abuse_of_internet.page .

In addition TeliaSonera is co-operating with INHOPE and promoting Inhope's illegal content reporting application through TeliaSonera App Launcher which is app discovery and distribution solution for mobile phones. INHOPE reporting application is available via TS App Launcher in Sweden, Norway, Denmark and Lithuania. Finland and Estonia will follow later.

3. <u>Where</u> is the reporting button/ mechanism located? (tick any that apply)
<input type="checkbox"/> <i>On each page of the website/service</i> <input type="checkbox"/> <i>Close to the point where such content might be reported</i> <input type="checkbox"/> <i>In a separate location such as a safety page</i> <input type="checkbox"/> <i>In a browser extension</i> <input checked="" type="checkbox"/> <i>In a separate app for a connected device</i> <input type="checkbox"/> <i>Other (please specify):</i>
4. <u>Who</u> may use such a reporting mechanism? (tick any that apply)
<input type="checkbox"/> <i>Only registered user/profile in which content is located</i> <input type="checkbox"/> <i>All registered users of the product/service?</i> <input checked="" type="checkbox"/> <i>Everyone including non-users, e.g. parents/teachers who are not registered for the service</i> <input type="checkbox"/> <i>Other (please explain):</i>
5. Which <u>kinds of content</u> can users report?
Such as mail bombing, intrusion attempts or received spam as well as any illegal material, such as child pornography, found on web pages.
6. Which of the following information do you provide to users? (tick any that apply)

<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 checked="" type="checkbox"/> <i>Other website/external agency for reporting abuse/ misuse content?</i> <input type="checkbox"/> <i>Other (please specify):</i>
<p>TeliaSonera is co-operating with INHOPE and promoting Inhope’s illegal content reporting application through TeliaSonera App Launcher.</p>
<p>7. Please provide details of any <i>other means</i>, in addition to a reporting button/icon, to report content or behavior which breaches your service’s terms and conditions</p>
<p>N/A</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).

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Please indicate, when relevant, the approach taken at Group/Corporate level and if you have different solutions in EU Market.

TeliaSonera is a member of the GSM Association's Mobile Alliance against Child Sexual Abuse, which sets out guidelines on notice and takedown processes to ensure removal of child sexual abuse material hosted on mobile operators' network.

TeliaSonera has formed social partnerships aimed at protecting children online with organizations such as The World Childhood Foundation and Surfa lugnt. TeliaSonera is also co-operating with Save The Children organization.

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

(tick any that apply)

- Company-own hotline reporting button or telephone number
- Link or button for external national or regional INHOPE hotline
- Emergency services
- Law enforcement agency
- Other external agency (please specify):

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

TeliaSonera, through its partnership with national law enforcement agencies, is actively engaged in blocking access to websites containing child sexual abuse content on its fixed and mobile broadband services in its European operations in the DNS level.

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?

TeliaSonera is also working with the software provider Netclean, who provides whitebox solution called 'Child SafeGuard', to block child sexual abuse material on the IP-level in cooperation with the Internet Watch Foundation. Child SafeGuard is placed in TeliaSonera's IP transit network in Sweden and Spain. TeliaSonera is seeking to implement blocking of child sexual abuse images in additional countries.

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.

TeliaSonera is committed to implementation of the GSMA Privacy by Design Guidelines, which provide minimum standards for application development in order to safeguard the privacy of users.

<http://www.gsma.com/publicpolicy/privacy-design-guidelines-for-mobile-application-development>

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?

TeliaSonera Group Privacy Policy covers all customers, including minors

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

Yes
 No
 Not applicable (please explain): TeliaSonera doesn't provide own content or platforms for user generated content. However the exception is the TeliaSonera IPTV, CableTV and terrestrialTV content by the third party where according to Act on Audiovisual Programs, all programs are classified with a certain age limit, depending on the program's content, and are to be given a symbol that describes the detrimental content of the program. If there is no reason to consider the program to be detrimental to the development of children, it shall be classified as suitable for all ages. This is applicable in Finland, Sweden, Norway and Denmark.

In addition, TeliaSonera IPTV service in Finland, Sweden, Denmark and Estonia includes parental control feature, set by a pin code. Parental control is blocking adult content from channels and rental videos as well as is capable to lock programmed recordings.

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):*

[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):*

Tips&tricks of safe mobile and internet use for children and parents

<http://www.sonera.fi/media/13e5a5b03801ddb71775e80ad4c3529a88f91bd7/13e5a5b03801ddb71775e80ad4c3529a88f91bd7.pdf>

<http://surfalugnt.se/>

5. Please outline briefly any additional policies or activities (existing or proposed), *not detailed above*, to ensure that personal information is protected, using reasonable safeguards appropriate to the sensitivity of the information.

Principle 6 – Education and Awareness

Requirements

Signatories should:

- Educate children and young people and give them up to date information to manage their access and settings in relation to content, services and applications, adding support where possible to existing initiatives and partnerships.
- Provide advice about features of the service or functionality that are available to allow parents to improve the protection of children, such as tools to prevent access to certain types of content or service.
- Provide links to other sources of relevant, independent and authoritative advice for parents and carers, teachers, and for children.
- Provide access to information that will help educate parents, carers, teachers and children about media literacy and ethical digital citizenship, and help them think critically about the content consumed and created on the internet.
- Encourage parents and teachers to use this information and talk to their children/pupils about the issues arising from the use of online services, including such topics as bullying, grooming and, where relevant, cost management

Please indicate, when relevant, the approach taken at Group/Corporate level and if you have different solutions in EU Market.

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):

www.sonera.fi/lapset

<http://surfalugnt.se/>

<http://www.digitark.ee/pariselt-ka-voi-ehk-kuidas-nutitelefone-targasti-kasutada/>

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

(tick any that apply)

<input checked="" type="checkbox"/> Online safe behavior <input checked="" type="checkbox"/> Privacy issues <input checked="" type="checkbox"/> Cyberbullying <input type="checkbox"/> Download and copyright issues <input checked="" type="checkbox"/> Safe use of mobile phones <input checked="" type="checkbox"/> Contact with strangers <input type="checkbox"/> Other topics (please specify)
3. With reference to any educational material you provide, <i>which of the following methods do you use?</i> (tick any as apply)
<input type="checkbox"/> Documentation provided with product/contract on purchase/first registration <input type="checkbox"/> A required presentation by salesperson completing sale <input type="checkbox"/> Displays/leaflets positioned prominently in stores <input checked="" type="checkbox"/> Notification by email / on-screen statement / other means when product or contract is purchased or first registered <input type="checkbox"/> Prominent notifications, resources or pop ups on website <input checked="" type="checkbox"/> Helpdesk (telephone or online) <input type="checkbox"/> Other (please specify):
4. Please provide details of any links to other <i>external organisations</i>, or relevant, independent and authoritative advice for parents/carers, teachers, and for children?
5. Please provide details of any campaigns, or active involvement in <i>industry partnerships</i> on specific topics to raise public awareness of digital safety for children and young people?
TeliaSonera is closely co-operating with security vendor F-Secure in order to build better marketing campaigns and increase awareness when selling internet security services to customers
6. Please provide details of any partnerships with <i>NGO, civil society or other educational agencies</i> or campaigns to raise public awareness of digital safety for children and young people.
TeliaSonera is co-operating with INHOPE and promoting Inhope's illegal content reporting application

TeliaSonera has formed social partnerships aimed at protecting children online with organizations such as The World Childhood Foundation and Surfa lugnt. TeliaSonera is also co-operating with Save The Children organization.

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.

TeliaSonera in Finland together with 40 organizations (covering ministries, state departments, telecom operators, data security companies, media companies and NGO's) is engaged in Media Literacy Week 2014 with the theme "Let's create a Better Internet Together". MLW is part of the Safer Internet Day. TeliaSonera gives expertise, volunteer work and free media space to MLW campaigns and events. Topics are social media privacy, digital games, cyberbullying, children media culture and online safety.
<http://www.mediataitokoulu.fi/mediataitoviikko-3/>

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.

See previous answer.

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

ANNEX

COUNTRY	PRODUCT/SERVICE	STATUS	COMMENTS
Austria			
Belgium			
Bulgaria			
Croatia			
Cyprus			
Czech Republic			
Denmark			
Estonia			
Finland			
France			
Germany			
Greece			
Hungary			
Ireland			
Italy			
Latvia			
Lithuania			
Luxembourg			
Malta			
Netherlands			
Poland			
Portugal			
Romania			
Slovakia			
Slovenia			
Spain			
Sweden			
United Kingdom			