



Implementation Questionnaire

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

1. Name of the company on whose behalf this submission is made:

The Walt Disney Company

2. Country or primary markets where products/services are offered (in EU) to which this submission applies [In which European markets does your company operate](#)

Disney products and services, including digital experiences, are offered throughout Europe.

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

The Walt Disney Company, together with its subsidiaries and affiliates, is a leading diversified international family entertainment and media enterprise with the following business segments: media networks, parks and resorts, studio entertainment, consumer products, and interactive media.

Disney’s stories, characters, and experiences reach consumers and guests from every corner of the global. Disney delivers world-class entertainment experiences to children and families every day.

The company operates a number of digital experiences in Europe and around the world. Responses to this submission are primarily focused on general design principles we incorporate throughout our digital entertainment offerings.

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: Ellen Blackler

Position: Vice President, Global Public Policy

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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 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.

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):

If yes, please provide details:

Our products are designed with safety and privacy protection in mind. Tools to manage privacy and safety are integrated throughout our digital experiences. These digital experiences are often age-differentiated so that product features and options are appropriate for and can be customized to the age of the user.

We provide safety tips and tools to parents and kids on our websites and integrated into products. An easily accessible “flag, report, block” feature is available when peer-to-peer or public posts are made. Access to Guest Services support is provided throughout digital environments as well. Reports are reviewed to determine if action is required.

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

Yes

No

X Not applicable (please explain):

Content inappropriate for children is not included in these offerings.

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)

X Content classification or labeling guidelines

How to block or restrict access to content

X How to report or flag content as inappropriate

X 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.):

We provide safety tips and tools to parents and kids on our website and integrated into relevant products. We also partner with industry leaders (including Google on Safer Internet Day 2019) to promote messages of online safety, such as "it's cool to be kind." In 2018/2019 we also worked with our studios and Channel talent (including talent from Ralph Breaks the Internet, and from our Disney Channel network Raven's Home cast) to promote safety messages to children.

We also provide information about responsible digital media use in our media and customer communications.

In addition to integrating safety messages in our own content and products, we support a number of NGO partners and join with industry coalitions to promote user awareness of many of these issues. For example, we are a long-time sponsor of [Frag Finn](#) which offers a sheltered surfing area specially created for children aged from 6 to 12 years old, and of the [Internet Watch Foundation](#), which works to prevent and remove child exploitation imagery and instances online.

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

The company's Terms of Use policy is available in 36 languages and is located at <https://disneytermsofuse.com/>. These Terms of Use can also be accessed from within digital products and apps, and on the Disney.com website.

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):

If yes, please identify relevant policy:

The Terms of Use provides related guidance on "Rules of Conduct" for users on Disney Sites. Likewise, there is extensive information on "Public Forums and Communications." Terms of Use can be found here: <https://disneytermsofuse.com/>.

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:

The Terms of Use include a section on "Removal of Submissions" which includes information on actions the company may take, as well as how to report such a violation. Our digital experiences often have direct methods of reporting content or behavior that violates the community guidelines.

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

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:

Disney strives to partner with parents to ensure the safety and entertainment experience of our digital offerings. We have a For Parents section on our website that offers general privacy and safety information specifically for parents and caregivers. Many of our online experiences offer product-specific dedicated parent portals with tips and controls for keeping kids safe online.

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

N/A

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*

[Please provide details including links or screenshots as relevant]

Where relevant to the service being offered, we provide educational and information resources regarding parental controls through email communications and For Parents sections or portals that offer product-specific parental control information including tips and controls for keeping kids safe online.

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

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.

Our Terms of Use outline Rules of Conduct applying to all Disney-operated websites. These rules include restrictions on images, videos, text, and behavior.

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).

We provide safety tips and tools to parents and kids on our websites and integrated into products. An easily accessible “flag, report, block” feature is available when peer-to-peer or public posts are allowed. Access to Guest Services support is provided throughout digital environments as well. Reports are reviewed to determine if action is required.

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):*

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):*

5. Which of the following kinds of content can users report?

Users can report any content they find inappropriate.

6. Which of the following information do you provide to users?

(tick any that apply)

Advice about what to report
 Advice about how to make a report
 Pre-defined categories for making a report
 How reports are typically handled
 Feedback to users
 Other website/external agency for reporting abuse/ misuse content?
 Other (please specify):

7. Please provide details of any *other means*, in addition to a reporting button/icon, to report content or behavior which breaches your service’s terms and conditions

In addition to the mechanisms to report users directly in the digital experience, players and users can submit questions or report content/behavior through a Contact Us customer service portal.

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

When Disney offered the interactive game and portal, Club Penguin, we relied on an extensive system of human and technical moderation to identify inappropriate behavior. This included:

- Moderators having received specific training designed to detect content or behavior that conflicts with Disney’s Terms of Use.
- For websites targeted at users under age 18, text must have been either pre-moderated or post-moderated as soon as reasonably possible and in no event later than 24 hours after posting. Websites targeting children under age 13 must also use an automated “bad words” filter.
- Audio, music, photos, and images must have been either pre-moderated or post-moderated within 24 hours of posting.
- Videos filtered using video fingerprinting technology may have been either pre-moderated or post-moderated within 24 hours of posting. If not filtered using video fingerprinting technology, video must have been pre-moderated.

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).

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.

We have established procedures in place to refer any suspected illegal content or behavior to the appropriate law enforcement officials. In the case of suspected child abuse or child grooming, our moderators refer the instance directly to an external agency in the relevant country, such as the Internet Watch Foundation or Virtual Global Taskforce (CEOP in the UK).

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

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?

The Disney Privacy Center provides our privacy policy in relevant languages for the countries in which we operate around the globe. Our privacy policy includes detailed information on children's privacy and offers a specific page 'For Parents,' which includes tips and tools for how parents might talk to children about online safety concerns.

We recognize the need to further privacy protections with respect to personal information we may collect from children on our sites and applications. Some of the features on our sites and applications are age-gated so that they are not available for use by children, and we do not knowingly collect personal information from children in connection with those features. When we intend to collect personal information from children, we take additional steps to protect children's privacy, including:

- Notifying parents about our information practices with regard to children, including the types of personal information we may collect from children, the uses to which we may put that information, and whether and with whom we may share that information
- In accordance with applicable law, obtaining consent from parents for the collection of personal information from their children, or for sending information about our products and services directly to their children

- Limiting our collection of personal information from children to no more than is reasonably necessary to participate in an online activity
- Giving parents access or the ability to request access to personal information we have collected from their children and the ability to request that the personal information be changed or deleted

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):

As a safety by design principle, we do not provide access to information on users of our child-targeted digital experiences.

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):

We provide access to change or update users' privacy status through the Privacy Controls [portal](#), by visiting the Communications Choices [page](#), contacting Guest [Services](#), or following instructions provided in outbound communications.

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):*

Our sites link to an Interest Based Ads portal located at: <http://preferences-mgr.truste.com/?pid=disney01&aid=disneyemea01&type=Disneyemea>

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

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):

Disney provides educational resources for kids using our entertainment content. Examples include public service announcements on Disney media networks and channels, on third party partners' sites (such as NGOs working in online safety, including Childnet in the UK), and the popular Wild About Safety [videos](#).

Many of our digital entertainment experiences also offer a product-specific dedicated parent portal with tips and controls for keeping kids safe online.

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):

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

Disney maintains annual support for child safety organizations across Europe, including Childnet international, the Internet Watch Foundation, and Frag Finn.

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?

In addition to partnerships with the organizations listed above, we are signatories to the Alliance to Better Protect Minors Online. Disney serves as Vice Chair on the Child Online Protection Working Group at the International Telecommunications Union (ITU), and actively promotes advancement of child protection in Internet policy forums such as ICANN and the Internet Governance Forum (IGF).

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.

We provide funding to, and collaborate actively with leading entities working to promote children’s safety in the European Union including Frag Finn, Internet Watch Foundation, Childnet International, Family Online Safety Institute (FOSI) (Board Member), UK Council for Child Internet Safety (UKCCIS), the Toy Industry of Europe (as a Member), and UNICEF.

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.

We incorporate information and engage kids on digital citizenship throughout our content and entertainment experiences, including our online and traditional media platforms.

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.

Our disney.com websites includes dedicated portals with online safety tips such as: <http://family.disney.co.uk/internet-safety>. This page, for example, includes downloadable guidance for keeping kids (and parents) safe online and a sample online safety agreement.

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

In addition to information submitted related to implementation of the ICT Principles, the following supplementary information supplied in either written form or in discussion with companies provides valuable context and information about the functioning and effectiveness of child safety provision.

1. In respect of ICT Principle 1, that companies should “continue work to provide innovative solutions able to support child safety protection tools and solutions”, please elaborate on company investment in child safety measures, including research. Elaborate also, where possible, on planned future implementations.

2. Any further data that companies may be able to provide regarding the functioning of child safety features would be an extremely valuable outcome of this assessment.

Where possible, please provide any available summary data in respect of the following elements. (Stipulate where data should only be presented in anonymised form).

Take up or frequency of use of parental control tools on your product or service?

Incidence of reporting use/misuse, categorization and frequency of reports on your product or service? How many? By whom? Which problem?

Kinds of actions taken by the provider for different categories of reports. What was the outcome?

How do you evaluate the effectiveness of response to reports?

Privacy settings: the percentage of children who have private profiles, and those who have changed default privacy settings (and how/what did they change), by age, gender and country

Use of location-based services by children

Take up and use of education and awareness raising activities undertaken for your product or service?

3. Please detail any additional measures adopted to evaluate the effectiveness of child safety features.