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# Implementation Questionnaire

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April 2017

## 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:

Telenor Denmark

### 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*

Denmark

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

Mobile and Fixed telephony and internet access

**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: Søren Johansen

Position: Senior Regulatory Advisor

Email: sojo@telenor.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 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:

**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): Telenor Denmark does not provide content services.*

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.):

Telenor Denmark has initiated the anti-bully #digitalpænt-campaign (<https://www.telenor.dk/om-telenor/vores-ansvar/digitalpaent/>) which was launched in collaboration with UNICEF.

Telenor Denmark has along with The Media Council for Children and The Youth and other industry players launched the parent guide on online behavior "There are so many things parents don't understand" ([http://www.dfi.dk/Boern\\_og\\_unge/Medieraadet-for-Boern-og-Unge/Nyheder/internet\\_og\\_mobil/Arkiv/Ny-guide-klaeder-foraeldre-paa-til-boernenes-online-liv.aspx](http://www.dfi.dk/Boern_og_unge/Medieraadet-for-Boern-og-Unge/Nyheder/internet_og_mobil/Arkiv/Ny-guide-klaeder-foraeldre-paa-til-boernenes-online-liv.aspx)) as well as the guide on mobile use: <http://video.dfi.dk/foraeldreguiden/>

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

N/A

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**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): .....

Telenor Denmark does not have platforms for user generated content for social networking services.

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): Telenor Denmark is not a content provider

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

**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:**

Telenor Denmark has no own parental control tools.

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

<p><b>3. In relation to parental controls, which of the following <i>educational and information resources</i> to do you offer?</b> (tick as many as apply)</p>
<p><input type="checkbox"/> <i>Company policy in relation to use of parental controls</i></p> <p><input checked="" type="checkbox"/> <i>Guidance about how to use parental controls</i></p> <p><input checked="" type="checkbox"/> <i>Educational or awareness-raising resources about the use of parental controls</i></p> <p><input type="checkbox"/> <i>A promotional or marketing channel for the uptake of parental controls</i></p> <p><input type="checkbox"/> <i>External links to educational material/resources about the use of parental control</i></p> <p><a href="http://www.dfi.dk/Boern_og_unge/Medieraadet-for-Boern-og-Unge/Nyheder/internet_og_mobil/Arkiv/Ny-guide-klaeder-foraeldre-paa-til-boerndenes-online-liv.aspx">http://www.dfi.dk/Boern_og_unge/Medieraadet-for-Boern-og-Unge/Nyheder/internet_og_mobil/Arkiv/Ny-guide-klaeder-foraeldre-paa-til-boerndenes-online-liv.aspx</a></p> <p><a href="http://video.dfi.dk/foraeldreguiden/">http://video.dfi.dk/foraeldreguiden/</a></p>
<p><b>4. Please outline any additional safety tools or solutions <i>not detailed above</i> that relate to parental controls, including any planned implementation of new features or procedures?</b></p>



## 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.*

The following is included in our framework agreement:

#### 1. General information concerning the network

- 1.1. Telenor actively uses methods to fight misuse of the Internet.
- 1.2. Customers who misuse the e-mail system for distribution or relay hosting of mail, spam or the like will be liable in damages for any costs inflicted on Telenor in this regard. Telenor is entitled to take the necessary precautions to safeguard the operation of Telenor's network. This may include – but is not limited to – blocking of traffic from networks, which are assessed to compromise the security of Telenor's network.
- 1.3. The Customer is responsible for checking that all material placed on Telenor's servers complies with current Danish and international legislation on copyright and, thus, does not infringe third-party rights.

### 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).

N/A

**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): .....*

N/A

**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

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

N/A

**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): .....

N/A

**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**

[Please provide details including links or screenshots as relevant]

N/A

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

N/A

## 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.**

Reports concerning online child pornography on any sites accessed by the user can be filed at "Red Barnet" – Danish InHOPE partner:

<http://stopdigitaleovergreb.nu/redbarnet/anmeld/>

In cooperation, Red Barnet and the Danish Police maintain an automatically updated list of child pornography sites that the Danish ISPs all block access to.

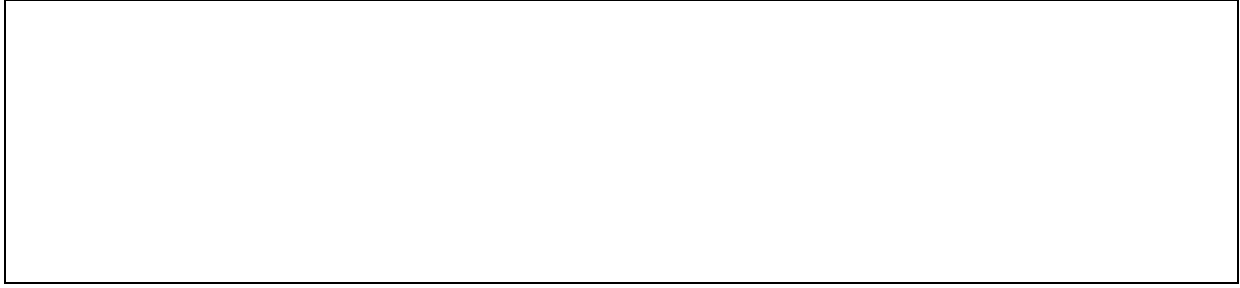
**3. Do you provide links to any of the following to enable users gain additional information in relation to child sexual abuse content or illegal contact?**

(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): .....*

<http://stopdigitaleovergreb.nu/redbarnet/anmeld/>

**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?**



## 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?**

Telenor’s privacy rules can be found here: <https://www.telenor.dk/andet/privacyregler/>

**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): .....

**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 have launched a privacy dashboard – it can be found on our website under “Mit Telenor”:

The image displays four screenshots of the Telenor privacy dashboard, each with a confirmation message at the bottom.

- Top Left:** "Få relevante nyheder" (Get relevant news). Confirmation: "Tak for din tilmelding!" (Thank you for your subscription!).
- Top Right:** "Del dit dataforbrug med Telenor" (Share your data usage with Telenor). Confirmation: "Tak for din tilmelding!" (Thank you for your subscription!).
- Bottom Left:** "Del din lokation med Telenor" (Share your location with Telenor). Confirmation: "Tak for din tilmelding!" (Thank you for your subscription!).
- Bottom Right:** "Del dine mobilvaner med Telenor" (Share your mobile habits with Telenor). Confirmation: "Tak for din tilmelding!" (Thank you for your subscription!).

### 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): .....*

[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.**



## 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?

X Younger children, i.e. under 13s

- Teenagers <18s
- Parents and carers
- Teachers and other adults
- Others (please specify): .....

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

(tick any that apply)

X Online safe behaviour

Privacy issues

X Cyberbullying

X Download and copyright issues

X 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)

**X** Other (please specify): We maintain our #digitalpænt-site (<https://www.telenor.dk/om-telenor/vores-ansvar/digitalpaent>) and we link to external resources – especially the abovementioned produced in collaboration with the Media Council for Children and the Youth:

[http://www.dfi.dk/Boern\\_og\\_unge/Medieraadet-for-Boern-og-Unge/Nyheder/internet\\_og\\_mobil/Arkiv/Ny-guide-klaeder-foraeldre-paa-til-boernehmens-online-liv.aspx](http://www.dfi.dk/Boern_og_unge/Medieraadet-for-Boern-og-Unge/Nyheder/internet_og_mobil/Arkiv/Ny-guide-klaeder-foraeldre-paa-til-boernehmens-online-liv.aspx)

<http://video.dfi.dk/foraeldreguiden/>

With regards to copyright/piracy issues Telenor – along with the rest of the Telecom Industry, The Rights Alliance, and the Ministry for Culture – has established the “Share With Care” campaign ([www.sharewithcare.dk](http://www.sharewithcare.dk)) promoting legal content.

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

Telenor is in cooperation with different organizations among others:

<http://skole-foraeldre.dk/>

<https://www.unicef.dk/>

[www.medieraadet.dk](http://www.medieraadet.dk)

**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?**

- The Digital Mirror: [www.detdigitalespejl.dk](http://www.detdigitalespejl.dk)
- “There are so many things parents don’t understand”:  
[http://www.dfi.dk/Boern\\_og\\_unge/Medieraadet-for-Boern-og-Unge/Nyheder/internet\\_og\\_mobil/Arkiv/Ny-guide-klaeder-foraeldre-paa-til-boernehmens-online-liv.aspx](http://www.dfi.dk/Boern_og_unge/Medieraadet-for-Boern-og-Unge/Nyheder/internet_og_mobil/Arkiv/Ny-guide-klaeder-foraeldre-paa-til-boernehmens-online-liv.aspx)
- Parent’s guide on mobile use: <http://video.dfi.dk/foraeldreguiden/>
- Safer Internet Day 2017: [http://www.dfi.dk/Boern\\_og\\_unge/Medieraadet-for-Boern-og-Unge/Videncenter/Sikker-Internet-Dag/Sikker-Internet-Dag-2017.aspx](http://www.dfi.dk/Boern_og_unge/Medieraadet-for-Boern-og-Unge/Videncenter/Sikker-Internet-Dag/Sikker-Internet-Dag-2017.aspx)

<p><b>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.</b></p>
<p>See above</p>
<p><b>7. Please outline briefly any of your own company initiatives in <i>media literacy and ethical digital citizenship</i>, designed to help children and young people to think critically about the content consumed and created on the internet.</b></p>
<p><b>8. Please provide details of any advice and supports <i>to encourage parents or teachers to talk to their children</i>/ pupils about the opportunities and risks arising from their use of the internet.</b></p>
<ul style="list-style-type: none"> <li>• “There are so many things parents don’t understand”:  <a href="http://www.dfi.dk/Boern_og_unge/Medieraadet-for-Boern-og-Unge/Nyheder/internet_og_mobil/Arkiv/Ny-guide-klaeder-foraeldre-paa-til-boernenenes-online-liv.aspx">http://www.dfi.dk/Boern_og_unge/Medieraadet-for-Boern-og-Unge/Nyheder/internet_og_mobil/Arkiv/Ny-guide-klaeder-foraeldre-paa-til-boernenenes-online-liv.aspx</a></li> <li>• Parent’s guide on mobile use: <a href="http://video.dfi.dk/foraeldreguiden/">http://video.dfi.dk/foraeldreguiden/</a></li> </ul>
<p><b>9. Please outline any additional activities or initiatives <i>not detailed above</i> that relate to education and awareness-raising offered by your service or product.</b></p>



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.**