



Implementation Questionnaire

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 Montenegro

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

Montenegro

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

Telecommunication 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: Natasa Djurdjic

Position: Communication and sustainability specialist

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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:

Telenor Montenegro is not a hosting provider and does not produce own content.

Telenor Montenegro supports the Computer Incident Response Team (CIRT), engaged in the handling of information security incidents, if one party involved in incident is in Montenegro and processing of submissions of illegal or harmful content on the Internet. Main priority in the work of the hotline is countering the spread of child sexual abuse images, sexual exploitation and physical and psychological attacks against children.

Telenor Montenegro also signed Memorandum of understanding on topic of safe internet and reporting with office of Montenegrin Ombudsman.

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:

Telenor was the first Montenegrin operator that has implemented a filter that blocks content with child pornography in mobile network. Customers that attempt to access website of this type from their mobile telephone or computer are being forwarded to our "Stop page".

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.):

www.cirt.me

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

Telenor Montenegro is not a hosting provider and does not produce own content. Regarding the 3rd party content, contractual obligation of 3rd party is to follow the Montenegrin legislation regarding protecting minors.

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 Montenegro does not provide UGC platform.

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 Montenegro does not provide UGC platform

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 Montenegro does not provide parental control tools.

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

N/A

3. In relation to parental controls, which of the following <u>educational and information resources</u> to do you offer? (tick as many as apply)
<input type="checkbox"/> <i>Company policy in relation to use of parental controls</i> <input checked="" type="checkbox"/> <i>Guidance about how to use parental controls</i> <input checked="" type="checkbox"/> <i>Educational or awareness-raising resources about the use of parental controls</i> <input type="checkbox"/> <i>A promotional or marketing channel for the uptake of parental controls</i> <input checked="" type="checkbox"/> <i>External links to educational material/resources about the use of parental control</i>
<p>[Please provide details including links or screenshots as relevant]</p> <p>Partners of Telenor Montenegro, NGO “Parents” are active promoters of our activities regarding safe internet environment.</p> <p>http://surfujpametno.roditelji.me/</p>
4. Please outline any additional safety tools or solutions <u>not detailed above</u> that relate to parental controls, including any planned implementation of new features or procedures?

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.*

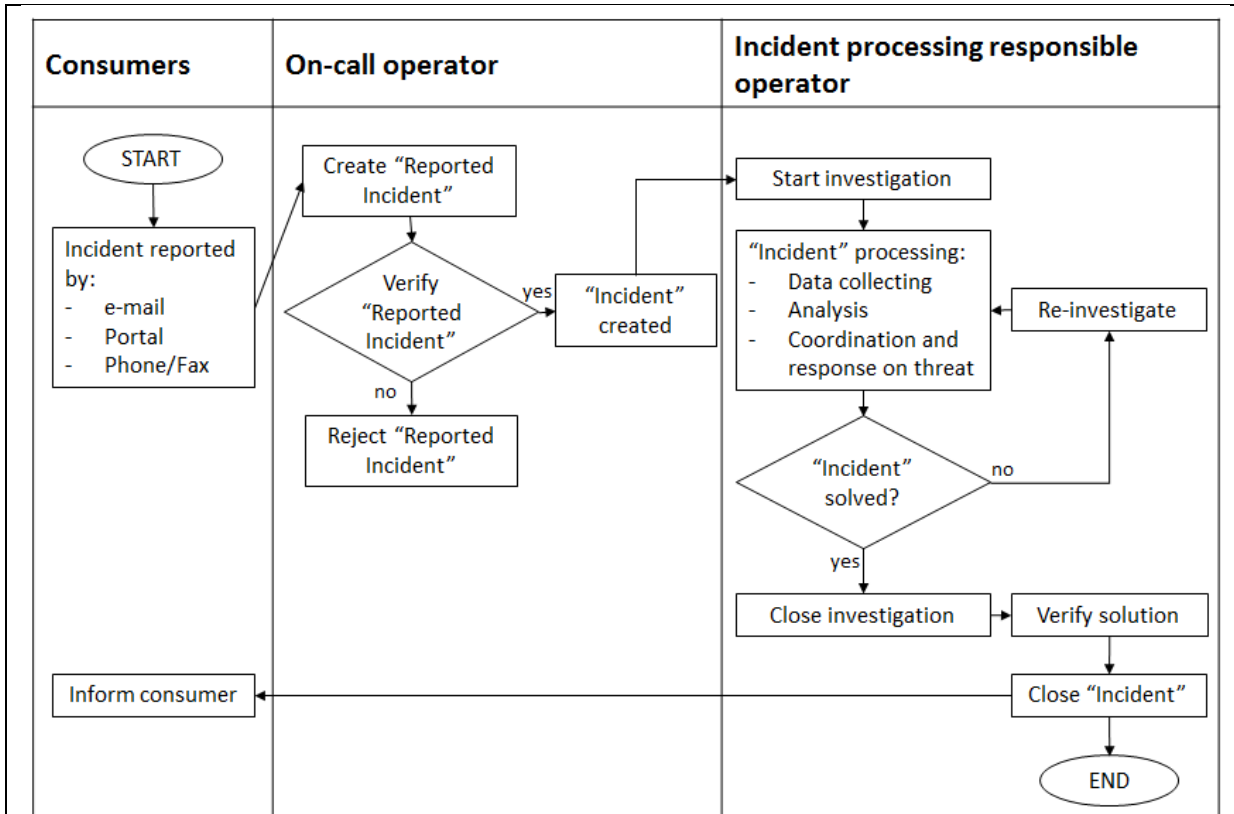
Telenor Montenegro does not host either professional or user-generated content.

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).

Telenor Montenegro is cooperating with CIRT, and as a part of its operations CIRT is implementing proactive and reactive measures. Reactive measures present assistance in identifying the perpetrators and restore system in the working condition. On website <http://www.cirt.me/cirt> users can report both, incidents or content.

Representatives are further establishing cooperation with INSAFE and INHOPE, as stated in Strategy for development of ICT society.

[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):

There is a separate web site, www.cirt.me

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?

Content that belongs to the following categories can be reported:

- photographs, video and/or textual materials that represent sexual molestation of a minor, as well as any other forms of child pornography;
- photographs, video and/or textual materials which show an adult person impersonate or act like they are a minor while engaged in sexual molestation or pornography;
- photographs, video and/or textual materials which promote, propagate or incentivize the commitment of psychological or physical violence over minors;
- photographs, video and/or textual materials which promote, propagate or incentivize hate speech aimed towards groups or individuals based on their gender, sexual orientation, race, ethnicity or religion.

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

[Please provide details including links or screenshots as relevant]

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

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.

Telenor Montenegro in partnership with the Ministry of Interior, introduced filters for blocking access to illegal websites with elements of child sexual abuse. Telenor Montenegro users that attempt to access website of this type from their mobile telephone or computer are being forwarded to our “Stop page”. At the same time, the Montenegrin Ministry of Interior Cyber Crime Department submits Telenor Montenegro a list of sites that the Ministry of Interior and Interpol have determined to contain illegal material.

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?

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 Montenegro Privacy Policy and Privacy Manual sets out the principles and requirements for processing and protection of personal data in Telenor Montenegro. This Policy sets out the principles and minimum requirements for processing and protection of Personal Data, while the Manual sets out mandatory requirements to support the implementation of the principles stated the Privacy.

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):

By submitting a request for obtaining information on personal data processing a customer can request to add/change/delete processed personal data
(<http://www.telenor.me/en/About-Telenor/Company/Custom-information-protection/>)

[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?

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):

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

(tick any that apply)

- Online safe behavior
- 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):

We have launched the initiative Surf Wisely in 2012 aiming to show to Montenegrin children, their parents and teachers that Internet can and should be primarily fun experience and that with the help of Internet they can learn many new and interesting things.

The project is aiming to prevent and decrease violence against and among children and ensure safe usage of digital media and is including following stages:

- Research study on the frequency and forms of digital bullying in schools and protection measures;
- Training for children and their teachers as the future peer educators;
- Workshops for school children, parents and teachers on benefits of mobile communication usage and prevention measures for different digital bullying forms;
- Raising awareness of all target groups through different communication channels (print and online media with the focus on social networks)
- Raising awareness campaign through the Facebook #SurfWisely page <https://www.facebook.com/SurfujPametno/> that has 5,396 followers at the moment

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

- Partners of Telenor Montenegro, NGO “Parents” are also active promoters of our activities regarding safe internet environment <http://surfujpametno.roditelji.me/>
- Telenor Montenegro promotes UNICEF Montenegro application NetPriatelj. The app contains an educational role-play game, which takes children through real life scenarios and makes them learn how to recognize, prevent, stop and report violence. https://www.unicef.org/montenegro/campaigns_29976.html

<p>5. Please provide details of any campaigns, or active involvement in <u>industry partnerships</u> on specific topics to raise public awareness of digital safety for children and young people?</p>
<ul style="list-style-type: none"> National SOS parent line was launched in Montenegro, making it possible for all parents and caregivers throughout the country to get advice on successful child upbringing. Representatives of Montenegrin mobile operators signed the Memorandum of Cooperation with the Agency for Electronic Communications and Postal Services and UNICEF Montenegro https://www.unicef.org/montenegro/media_30392.html
<p>6. Please provide details of any partnerships with <u>NGO, civil society or other educational agencies</u> or campaigns to raise public awareness of digital safety for children and young people.</p>
<p>Since the beginning of #SurfWisely initiative in 2012, Telenor Montenegro has established co-operation with the Ministry for Information Society and Telecommunications, the Ministry of Education, Ombudsman, the Association of Parents and design company Fleka. From the very beginning elementary schools, where peer education is taking place, have given great support. #SurfWisely initiative aimed at raising awareness on safe usage of internet and digital communications, implementing and evolving in cooperation with schools and peer educators – Safe internet ambassadors from all over Montenegro. Targeting thousands of teenagers in a program designed to help them get most of the benefits out of internet, with fewer risks.</p>
<p>7. Please outline briefly any of your own company initiatives in <u>media literacy and ethical digital citizenship</u>, designed to help children and young people to think critically about the content consumed and created on the internet.</p>
<p>Telenor Montenegro initiatives in media literacy and ethical digital citizenship are conducted under the #SurfWisely initiative.</p>
<p>8. Please provide details of any advice and supports <u>to encourage parents or teachers to talk to their children/</u> pupils about the opportunities and risks arising from their use of the internet.</p>

Telenor Montenegro and its partners encourage parents and teachers to talk to their children and pupils through the activities of the #SurfWisely initiative.

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

Telenor Montenegro traditionally joins Safer Internet Day, and through awareness raising campaign supports a landmark event in the online safety calendar.

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.