



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 there 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:

Brian O’Neill Email: brian.oneill@dit.ie Tel. + 33 86 8030050

Thuy Dinh Email: thuy.dinh@dit.ie Tel. + 353 1 402 4173

The present text complements the Telecom Italia’s commitments document, which is attached.

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

Telecom Italia S.p.A.

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

At European level, Telecom Italia operates in Italy.

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

Telecom Italia is a leading electronic communications operator, with business operations in: fixed and mobile telecommunications, internet, office and systems solutions, research and development.

4. Nature of activity
<input type="checkbox"/> <i>Manufacturers of desktop and laptop computers, mobile phones, tablets, TV set top boxes and gaming consoles</i> <input checked="" type="checkbox"/> <i>Network operators and connectivity providers</i> <input checked="" type="checkbox"/> Online content provider <input checked="" type="checkbox"/> <i>Online service provider</i> <input type="checkbox"/> <i>Other (please specify):</i>
5. Person(s) completing the report
Name: Position: Email:

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.

Information obligations towards users are imposed on service providers by the Italian regulatory system as well by national self-regulatory codes of conduct, such as the one on self-regulatory measures applicable to premium services (VAS). In order to improve transparency and informed choice by the users, specific services guidelines and policies, in particular for VAS, are published on the National Regulatory Authority website, as well as in the operators' ones.

For further details about the information that Telecom Italia provides to the customers about the correct use of its services, please refer to the TI's commitments document.

The present text complements the TI's commitment document.

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?

<p><input type="checkbox"/> X Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable (please explain):</p> <p>Telecom Italia provides its customers with the possibility to report about an event which can be considered as a case of abuse in the use of services offered by Telecom Italia. For further details, please refer to answer n. 4 and to TI's commitment document.</p> <p>If yes, please provide details:</p>
<p>2. Do you offer a means <u>for restricting / blocking access</u> to potentially inappropriate content for users of your service or product?</p> <p><input type="checkbox"/> x Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable (please explain):</p> <p>If yes, please provide details of mechanisms in place: Telecom Italia provides a number of means to restrict and/or block access to potentially inappropriate content for users. These can take the form of parental control mechanisms which can be installed by the parents both on fixed and mobile services (www.telecomitalia.it/servizi/sicurezza) , and the form of specific PIN code to be dialed before accessing the VAS services.</p>
<p>3. Do you provide any <u>information, educational resources or advice for users</u> in any of the following areas? (tick as many as apply)</p>

<p><input type="checkbox"/> <i>Content classification or labeling guidelines</i></p> <p><input checked="" type="checkbox"/> <i>How to block or restrict access to content</i></p> <p><input checked="" type="checkbox"/> <i>How to report or flag content as inappropriate</i></p> <p><input type="checkbox"/> <i>Safe searching</i></p> <p><input checked="" type="checkbox"/> <i>Information about your company's content policy in relation to children</i></p> <p><input type="checkbox"/> <i>Not applicable (please explain):</i></p> <p>If yes, please provide details including the format of any material provided (video, text, tips, games, FAQs, etc.):</p> <p>Telecom Italia provides its customers with information, educational resources or advice for users in different ways, in particular through a) its institutional and commercial websites (by way of example, on TI's website, specific pages are dedicated to the minor protection and education, such as NavigareSicuri), b) in the Terms and Conditions of contracts, c) material (booklets, etc.) specifically elaborated and distributed to children and educators, d) education and awareness raising campaigns, specifically in the schools and other sights where children and educators are conveyed.</p>
<p>4. Where is your company's <u>Acceptable Use Policy (AUP)</u> located?</p> <p>The AUP relates to the services where the interactive functionality with the users is provided for.</p> <p>The specific AUP for minors and the Netiquette are located within the company's website at the following link: telecomitalia.it/servizi/per-la-sicurezza/tutelare-i-minori-sul-web</p> <p>The AUP is also part of the Terms and Conditions of the Contract.</p> <p>For further detail about the information provided to users, please refer to Section 1 of the TI's commitment document.</p>
<p>5. Does the AUP or separate give clear guidelines with which <u>user generated content</u> must comply (including details about how users are expected to behave and what is not acceptable)?</p>

<p><input type="checkbox"/> x <i>Yes</i></p> <p><input type="checkbox"/> <i>No</i></p> <p><input type="checkbox"/> <i>Not applicable</i> (please explain):</p> <p>If yes, please identify relevant policy: In case TI's services allow for the use of user generated content (by way of example, a chat), users must subscribe the AUP.</p>
<p>6. Do you provide notice about the <u>consequences for users</u> if they post content which violates terms of service or community guidelines?</p> <p><input type="checkbox"/> x <i>Yes</i></p> <p><input type="checkbox"/> <i>No</i></p> <p><input type="checkbox"/> <i>Not applicable</i> (please explain):</p> <p>If yes, please identify relevant policy: The Company reserves the right to remove the content posted by the end users, which is not compliant with the T&C or the service Netiquette.</p>

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:

For Telecom Italia Broadband customers, it’s available a security pack, under subscription, called Total Security which includes a Parental Control feature. Service is client-server solution therefore, once installed, parents can choose among a list of 30 categories those that they want to ban to their children (ex: gambling, e-commerce, porno, etc.)

Screenshots are visible at this [link](#)

Also in the mobile world, specific mechanisms for the minors protection are available. In particular, in the mobile world, a mechanism of black list is applicable: when the TIM card can be used by a minor, the user – at the moment of purchase or by calling the 119 service - can require to insert the SIM number into a black list that does not allow minors to access a number of sensitive services.

For further information please refer to TI’s commitment document, Section 3.

The Use rules for the TIM pre-paid contracts and TIM subscriptions’ General Conditions provide that: “Telecom, in the full respect of the applicable legislation, make available to the Client a series of minors protection tools from the access to sensitive content offered by TI. These tools are regularly updated and communicated to the Client through TI’s information channels, including the Client Assistance Service 119, the website www.tim.it, the TIM Services Chart. The protection tools currently available are: a) inclusion, as far as adult content is concerned, of any mobile line within a black list: i.e. mobile user cannot,

permanently, access adult content; b) access to Adult content is allowed only through the dialling of a specific PIN ("Pin Adult"), different from other PIN used on the same device, in order to inhibit minor from the access to those content offered on the TIM mobile portal (cd. "WAP TIM"). This "PIN Adult" is provided to the Client in a separate and private modality. The Client is therefore responsible for the PIN correct use and care; c) for sensitive content different from the Adult content, it is upon the Client choice to request, anytime, the inclusion of his/her number in the black list, through the usual TI's channels, through the Client Assistance Number 119 and at the TIM shops.

Moreover, in the TIM shops, the client may always require to activate a TIM card, with the "OKIDS" functionality, dedicated to minors, which provides that:

"Telecom Italia, according to art. 1, point 3, of AGCOM order n. 661/06/CONS related to "Misure di sicurezza in materia di tutela dei minori da implementare sui terminali mobili di videofonia" and in the respect of the applicable legislation, makes available to the client a series of minor protection tools from the access to sensitive content, accepts that the TIM card is inhibited from the:

1. access and use of "Adult" content offered directly by TI or indirectly through third companies with whom TI has concluded specific agreements;
2. access, through apn wap and apn ibox, and use of services with "Sexy" content and "Gambling" services offered directly by TI or indirectly through third companies with whom TI has concluded specific agreements
3. traffic to non- geographical numbers for VAS with code 892/894/895/899."

For further detail, please refer to TI's commitments document.

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

Restriction of access to web sites by category

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]

A dedicated section on “Sicurezza/Protezione Minori” is located on the website <http://assistentatecnica.telecomitalia.it>. There, all information on how to set the parental control mechanisms can be found. The link is available [here](#)

Other useful information and advise on how to use Internet, both for Parents and Kids can be found at this [link](#) and also [here](#)

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?

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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.

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.

Telecom Italia makes publicly available the information on the procedure that it has established for the abuses notices which are at the users' disposal, through a specific communication on the Telecom Italia corporate website.

<http://www.telecomitalia.com/tit/it/sustainability/form-abuse.html>

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).

The law provides for a blocking process, which is based on a black list provided by Law Enforcement agencies; the black list is automatic and updated twice a day. Content removal, which implies their alteration and loss of traceability (e.g., time stamping, integrity, etc.) and may hamper investigation activities, can be ensured only after notification provided by the Law Enforcement Authorities (i.e. Postal and Communications Police).

The internet user can notify to TI the existence of an illegal content/behaviour. The report is received by the abuse desk team - which has been appropriately set up - and duly managed. The user which has specified its e-mail address receives a feedback by email about the receipt of the report. No feedback is given for reports coming from automated systems or spam.

TI allows users to report about illegal content or behaviours through appropriate mailboxes (abuse@business.telecomitalia.it, abuse@retail.telecomitalia.it, abuse@telecomitalia.it) and a proper web form, which is accessible via specific links in the footer of the institutional sites.

For further details please refer to TI's commitment document.

[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): **links in the footer of the institutional web sites**

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 kinds of content can users report?

- **Illegal offer of goods and services (e.g. illegal arms, fake medicines, unauthorised gambling services etc.).**
- **Illegal promotion of goods and services.**

Comment [ZL1]: DA Notice and Action - consultazione pubblica UE.Valutare se lasciare.

<ul style="list-style-type: none"> • Content facilitating phishing, pharming or hacking. • Infringements of copyright and related rights. • Infringement of consumer protection rules. • Child abuse content. • Cybercrime and WWW domain black list on Illicit Online Gaming (from Law Enforcement, AAMS)
<p>6. Which of the following information do you provide to users? (tick any that apply)</p>
<p><input checked="" type="checkbox"/> <i>Advice about what to report</i></p> <p><input checked="" type="checkbox"/> <i>Advice about how to make a report</i></p> <p><input checked="" type="checkbox"/> <i>Pre-defined categories for making a report</i></p> <p><input type="checkbox"/> <i>How reports are typically handled</i></p> <p><input checked="" type="checkbox"/> <i>Feedback to users</i></p> <p><input type="checkbox"/> <i>Other website/external agency for reporting abuse/ misuse content?</i></p> <p><input type="checkbox"/> <i>Other (please specify):</i></p>
<p>7. Please provide details of any <u>other means</u>, in addition to a reporting button/icon, to report content or behavior which breaches your service's terms and conditions</p> <p>abuse@business.telecomitalia.it abuse@retail.telecomitalia.it abuse@telecomitalia.it</p> <p>[Please provide details including links or screenshots as relevant]</p>
<p>8. Please outline briefly any other procedures or programmes offered by your service <u>not detailed above</u> that relate to abuse /misuse.</p>

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Principle 4 – Child Sexual abuse content or illegal contact

Requirements

Signatories should:

- Co-operate with law enforcement authorities, as provided for in local law, regarding child sexual abuse content or unlawful contact.
- Facilitate the notification of suspected child sexual abuse content to the appropriate law enforcement channels, in accordance with existing laws and data protection rules.
- Ensure the prompt removal of illegal child sexual abuse content (once it has been confirmed as illegal by the relevant public authority) in liaison with national law enforcement.
- Provide relevant additional information and/or links to users so they can make a report or obtain information about appropriate agencies or organisations that users can contact about making a report or obtaining expert advice, at national and EU level (e.g. law enforcement agencies, national INHOPE hotlines and emergency services).

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

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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.

Telecom Italia has in place an efficient mechanism of Notice and Take down of Child abuse material. Once the notice is received by the TI's abuse desk team, it is forwarded with no delay to the competent authority for the due verification. Usually, if a CAM is found, TI informs the competent authority (the Centre for the fight against the child-pornography, according to Law 38/2006) about the report and put the CAM off-line in order to allow competent authorities to manage it while hampering the public access to it.

The removal of a CAM is allowed only following a specific order of the competent authority. As a matter of fact, Law n. 38 of 6 February 2006, containing provisions for the fight against child sexual exploitation and child pornography also through internet, establishes the Centre for the fight against the child pornography online (a structure within the Ministry of the Interior), which is in charge of managing all notices related to crimes. The law obliges ISPs to notify to the Centre, when they have knowledge, and with no delay, all notices and information related to the crime. At the same time, they are under the obligation to retain the relevant data related to the crime for at least 45 days in order to allow public authorities to carry on their investigative and repressive duties.

To fully comply with these obligations, TI, upon the receipt of a substantiated notice - puts the CAM off-line (in a private space), in order to allow the competent authorities to access it to the aim of the investigations and legal proceeding while not allowing access to the users.

In addition, the law provides for a blocking process, which is based on a black list provided by Law Enforcement agencies.

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

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

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?

Please refer to TI's commitment document

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

<p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Not applicable (please explain):</p> <p>If yes, please briefly outline available age-appropriate privacy settings (Provide details including relevant links/ screenshots on your website)</p> <p>Please identify default settings for each <u>age category</u> of under 18s, as relevant:</p> <p>Please identify any steps you have taken to ensure that these settings are <u>easy to understand, prominently placed, user friendly and accessible</u>.</p>
<p>3. Where are users able to view and change or update their privacy status? tick any that apply)</p>
<p><input type="checkbox"/> On each page of the website/service</p> <p><input type="checkbox"/> At each point where content may be posted</p> <p><input type="checkbox"/> In separate location such as a settings/safety/privacy page</p> <p><input type="checkbox"/> In a browser extension</p> <p><input type="checkbox"/> In a separate app for a connected device</p> <p><input type="checkbox"/> Other (please specify):</p> <p>[Please provide details including links or screenshots as relevant]</p>
<p>4. Which of the following <u>information, resources or help features</u> (if any) are provided to encourage users to make informed decisions about their privacy or the information they share?</p>

- 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

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

For all details about TI's education and awareness activities, which TI is very much focused on, please refer to TI's commitments document.

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):

See previous answer

**2. Which of the following *topics* are included within your own company educational materials?
(tick any that apply)**

<ul style="list-style-type: none"><input type="checkbox"/> Online safe behaviour<input type="checkbox"/> Privacy issues<input type="checkbox"/> Cyberbullying<input type="checkbox"/> Download and copyright issues<input type="checkbox"/> Safe use of mobile phones<input type="checkbox"/> Contact with strangers<input type="checkbox"/> Other topics (please specify) <p>See previous answer</p>
<p>3. With reference to any educational material you provide, <u>which of the following methods do you use?</u> (tick any as apply)</p>
<ul style="list-style-type: none"><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 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 type="checkbox"/> Helpdesk (telephone or online)<input type="checkbox"/> Other (please specify): <p>See previous answer</p>
<p>4. Please provide details of any links to other <u>external organisations</u>, or relevant, independent and authoritative advice for parents/carers, teachers, and for children?</p>
<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>
<p>See previous answer</p>

<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>In June 2013 Telecom Italia launched a specific initiative involving the relevant associations and stakeholders, called “Stati generali della tutela dei minori online”, that sets the basis for a regular collaboration amongst Telecom Italia and the main associations in the minor protection field. In this context we have also launched a trial website www.tutelaminorionline.it</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>In addition to what mentioned in the previous answer, TI (TIM) and other relevant stakeholders has recently concluded a Framework Agreement with the Italian Ministry of education and research (MIUR) aimed at promoting the initiative “iostudio – La Carta dello Studente” by applying to students advantageous conditions such as reductions or the free access to cultural sights and services.</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>
<p>9. Please outline any additional activities or initiatives <u>not detailed above</u> that relate to education and awareness-raising offered by your service or product.</p>

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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			