



Implementation Questionnaire

11 October 2013

Centre for Social and Educational Research
Dublin Institute of Technology



Introduction

Notes/instructions on completing this template

- Please complete all sections and all questions as far as possible
- Where a question or section is not applicable, please mark as N/A
- Where is overlap – or no change – to information previously submitted in company statement of commitments, please simply enter “refer to self-statement”
- URLs or screenshots (with links) are particularly useful in illustrating individual points
- Please add any additional information/data relevant to the submission at the end of the appropriate Principle
- In case you have different solutions in EU markets, please provide examples in the relevant sections

Contact details for any clarification or any assistance in completing this template:

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

Deutsche Telekom AG
Friedrich-Ebert-Allee 140
53113 Bonn
Germany

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

In January 2013, Deutsche Telekom has committed to a set of 25 measures to further increase child online safety (refer to self-statement).¹ These apply to every subsidiary company of Deutsche Telekom Group:

- T-Mobile Austria GmbH, Austria
- Hrvatski Telekom d.d., Croatia
- T-Mobile Czech Republic, a.s., Czech Republic
- Telekom Deutschland GmbH, Germany
- COSMOTE (COSMOTE Mobile Telecommunications S.A.), Greece

¹ http://ictcoalition.eu/gallery/ICT%20Coalition%20implementation%20measures_DT%20Group.pdf and <http://www.cr-report.telekom.com/site13/customers/protecting-minors#atn-1362-2271>

- OTE (Hellenic Telecommunications Organization S.A.), Greece
- Magyar Telekom Nyrt., Hungary
- T-Mobile Netherlands B.V., Netherlands
- T-Mobile Polska S.A., Poland
- COSMOTE (Romanian Mobile Telecommunications S.A.), Romania
- RTC (Romtelecom S.A.), Romania
- Slovak Telekom, a.s., Slovakia

In the course of 2013, great progress has been made in each subsidiary company. The examples provided in this report illustrate some of these achievements. Consequently, Deutsche Telekom increasingly provides a consistent and high level of child online safety across its EU footprint.

The implementation has been undertaken in good faith to meet specific cultural preferences, different technologies and considering the varying subsidiary companies' service and product portfolios as well as already established safeguards.

Various additional commitments have been undertaken by Deutsche Telekom Group's subsidiary companies on national level too. Further steps are already planned or ongoing.

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

The various services and products of the above listed subsidiary companies are included.

4. Nature of activity

(no) *Manufacturers of desktop and laptop computers, mobile phones, tablets, TV set top boxes and gaming consoles*

Network operators and connectivity providers

(no) *Online content provider*

(no) *Online service provider*

Other (please specify):

The main business focus is clearly on networks and connectivity. In some markets additional services and products are provided, including e.g. TV services, online content or online services. Particularly this refers to Croatia, Germany, Greece, Hungary and Slovakia.

5. Person(s) completing the report

Name: Mr. Malte FIRLUS

Position: Public Affairs Manager

Email: malte.firlus@telekom.de

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.

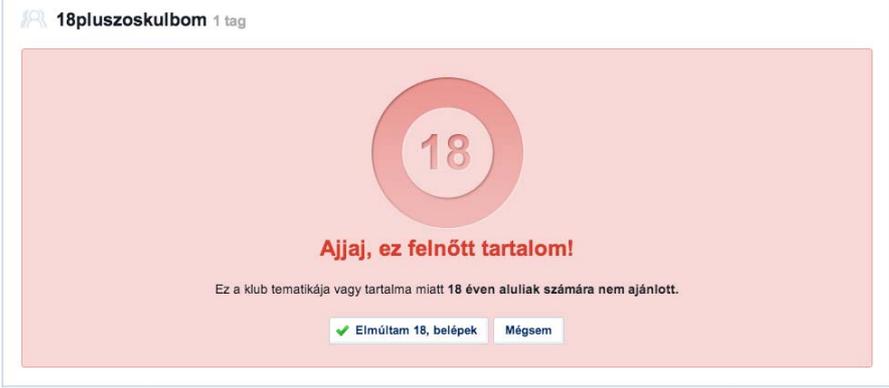
Based on Deutsche Telekom Group's approach, each subsidiary company specifies its measures individually:

Classification rules for digital content differ widely between the different EU Member States and, accordingly, subsidiary company apply different classification schemes in different geographical markets. To establish a common minimum standard, Deutsche Telekom commits to:

- Classification of commercial own and third party content on own digital content platforms in at least two categories: suitable for all age groups and suitable only for adults.
- Higher granularity (e. g. 16+, 12+) is applied in some markets, according to national standards in other media.

National example:

- In Hungary, pop-up windows within Magyar Telekom's online services Life.hu and Origo.hu indicate if adult content might be accessible. These pop-up windows also recommend the usage of filtering software, suggested by the Association of Hungarian Content Providers.

	
<p>1. Do you provide a mechanism for consumers to <u>provide feedback, report an issue or file a complaint</u> about the appropriateness of a piece of content?</p>	
<p><input checked="" type="checkbox"/> Yes</p> <p>Measures such as providing feedback, report and issue or file a complaint are only necessary in Deutsche Telekom's products and services that allow users to share their content. Such content is not fully controlled by Deutsche Telekom and, thus, may impair children.</p> <p>Deutsche Telekom's mechanisms that refer to user generated content and the respective products and services are described in Chapter 3.</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 checked="" type="checkbox"/> Yes</p> <p>Deutsche Telekom's means to restrict/ block access are elaborated in Chapter 2.</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>	

(no) *Content classification or labeling guidelines*

How to block or restrict access to content

How to report or flag content as inappropriate

(no) *Safe searching*

(no) *Information about your company's content policy in relation to children*

(no) *Not applicable (please explain):*

Deutsche Telekom's measures that refer to providing information on blocking or restricting access to content are elaborated in chapter 2, on reporting or flagging content as inappropriate in chapter 3.

Further information, educational resources or advice for users can be provided by subsidiary companies individually, e.g. on the Child Online Safety Webpage (see chapter 6)

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

AUPs are necessary in products and services that allow users to share their content. Deutsche Telekom's measures that refer to the AUP are elaborated in Chapter 3.

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

AUPs are necessary in products and services that allow users to share their content. Deutsche Telekom's measures that refer to user generated content are elaborated in Chapter 3.

6. Do you provide notice about the consequences for users if they post content which violates terms of service or community guidelines?

Yes

Guidelines are necessary in products and services that allow users to share their content. Deutsche Telekom's measures that refer to user generated content are elaborated in Chapter 3.

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.

Based Deutsche Telekom Group’s approach, each subsidiary company specifies its measures individually:

By providing Internet access services Deutsche Telekom cannot control or assume responsibility for content available over the open Internet. To assist parents and carers, Deutsche Telekom is however committed to provide customers with tools that allow parents to accommodate Internet usage to the needs of their children:

Committed measures 1 and 2:

- Offering a service for mobile Internet access via Smartphones allowing customers to filter inappropriate content from open Internet resources and/ or limit the usage of child safety relevant services.
- For fixed Internet access, a service is offered allowing customers to filter inappropriate content from open Internet resources.

National examples:

- In Greece, COSMOTE pre-installs on all android smartphones, which are sold by COSMOTE, the app “Lookout”. OTE offers OTE Secure, a security solution for PCs that includes parental control. OTE Secure provides full protection to the e-mail and computer, including an enriched function of parental controls. The parental control tool allows parents to control, filter and block access to web pages with inappropriate content, setting the protection level according to the children's age (ote.gr/en/web/guest/help-and-support/faq/abuse/-/support/article/1287399#)
- Telekom Deutschland offers the own developed mobile app “Surfgarten” and an own developed PC software “Kinderschutzsoftware”. Both include e.g. several filters, which can be set according to the specific needs of the child, safe search functions and time restriction features. The tool has been officially approved by the German Youth Protection Commission (Kommission für Jugendmedienschutz) (mobile: tarife-und-produkte.t-online.de/surfgarten-app-schuetzen-sie-ihre-kinder-beim-surfen-im-mobilien-internet/id_63812980/index) (fixed:

hilfe.telekom.de/hsp/cms/content/HSP/de/3378/FAQ/theme-45858870/Internet/theme-45858698/Sicherheit/theme-540406116/Schutz-fuer-Kinder/theme-45858539/Kinderschutz-Software/faq-211241653)

- Slovak Telekom's network based solution, which is also offered for mobile internet in February 2014: telekom.sk/english/corporate-responsibility/child-safety
- T-Mobile Austria's network based filtering tool: t-mobile.at/aktuelles/kindersicherung/index.php
- Magyar Telekom's network based filtering tool: for mobile t-mobile.hu/lakossagi/tarifak/szolgaltatasok/mobilinternet/bongesztes_mobilon/gyerekzar and for fixed: t-mobile.hu/lakossagi/tarifak/szolgaltatasok/mobilinternet/biztonsag/internet); additionally, the offered mobile app of "Norton" t-mobile.hu/lakossagi/keszulekek/alkalmazasok/norton.

Committed measure 2:

- Additionally, Deutsche Telekom offers a child safety price plan in mobile communications, which allows customers to block internet access.

National examples:

- T-Mobile Austria's Safety Package: t-mobile.at/unternehmen/das_unternehmen/Kinder_und_jugendschutz.php
- Telekom Deutschland's Combi Card Teens: t-mobile.de/combicard/teens/0,10849,15658-,00.html
- Slovak Telekom's Rodičovské služby: telekom.sk/osobne/telefonovanie/mobilne-sluzby-a-tarifny/dalsie-sluzby/rodicovske-sluzby

Committed measure 3:

On own digital content platforms adult erotic content is only offered if age verification mechanisms are applied to prevent access by minors.

National examples:

- In Germany "ID-Pass" (id-pass.de) provides an effective mechanism for age verification in the internet.
- In Greece, TV-channels with adult content can only be ordered face-to-face in a retail or affiliate shop of OTE. This ensures that only adult customers can purchase them. Additionally, the customer receives a personal pin-number which he or she must use for verification before watching any on-demand adult content.

Committed measure 4 and 5:

- To improve the awareness on availability and to help increasing the usage of parental control tools, measures listed above are offered via e-channels and promoted on companies' Child Online Safety Webpage.
- Information on parental control tools is made available with own-branded product information when purchased by customers.

National examples:

- T-Mobile Austria: www.t-mobile.at/aktuelles/kindersicherung/index.php
- T-Mobile Czech Republic: www.t-mobile.cz/web/cz/katalog-sluzeb/pece-a-bezpecnost/detsky-zamek
- Telekom Deutschland: www.telekom.de/kinderschutz
- Slovak Telekom: www.telekom.sk/osobne/internet/dalsie-sluzby/rodicovska-kontrola
- T-Mobile Austria provides folder in shops, OTE provides the information in TV offering's service manuals and Hrvatski Telekom's customer receive a SMS that informs about parental control tools after sim card activation.

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:

Deutsche Telekom's parental control tools for mobile and fixed networks are either software or network based. The specific tools differ between markets. In any case, the choice of applying filters and other features of parental control tools is entirely up to the customer and not set through Deutsche Telekom by default.

National examples are provided above.

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

National examples of the child safety price plan and age verification systems are provided above.

3. In relation to parental controls, which of the following *educational and information resources* to do you offer?

(tick as many as apply)

- (no) *Company policy in relation to use of parental controls*
- (no) *Guidance about how to use parental controls*
- (no) *Educational or awareness-raising resources about the use of parental controls*
- A promotional or marketing channel for the uptake of parental controls*
- (no) *External links to educational material/resources about the use of parental control*

Committed measures to promote the usage of parental control tools are listed above (offering parental controls in e-channels, promotion on child online safety webpages and in own-branded product information), including national examples how they are implemented.

Beyond Deutsche Telekom Group's commitment, additional measures can be applied by subsidiary companies individually.

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?

Beyond Deutsche Telekom Group's commitment, additional measures can be applied by subsidiary companies individually.

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.

Based on Deutsche Telekom Group's approach, each subsidiary company specifies its measures individually:

Deutsche Telekom commits to provide reporting tools for users in all services that may contain harmful or inappropriate content, as defined in the service's terms. Accordingly, this commitment refers to post-/un-moderated consumer hosting services allowing users to share their uploaded content publicly or with a limited audience.

Committed measure 1:

- For the use of consumer hosting services, customers have to agree with the terms of service. The terms set out which content and behaviour is allowed on the relevant services and/ or which not.

National examples:

- In Hungary, users have to explicitly accept the terms of use Magyar Telekom's service lwiw.hu (Screenshot 1), which clearly explains what is allowed and what is not allowed.

*Születési év [dropdown] [lock icon]

*Születési hónap és nap [dropdown] [lock icon]

*Jelszó [text] [help icon]

Jelszó erősség [progress bar]

*Jelszó megint [text]

*Felhasználási feltételek Elfogadom a felhasználási feltételeket ←

*Email cím [text]

Írd be a képen látható karaktereket!

squad osepRai

Adja meg a két szót

reCAPTCHA™ stop spam. read books.

Válaszoldj az alábbi kérdésre: Melyik magyar együttes slágere A hűtlen és a Kölyköt voltam című dalok?

[text]

[Regisztrálok!](#)

- In Slovakia, users of Slovak Telekom’s service Zoznam.sk have to accept the terms of service. Those clearly state that it is forbidden to e.g. threaten the physical, mental or moral development of minors, or interfere with their mental health and emotional state, or to post illegal content (www.media.zoznam.sk/zoznam-v-cislach/podmienky-zoznam-sk-platne-od-20-12-2011).

Committed measure 2, 3 and 4:

- In line with this, all respective consumer cloud and hosting services include an online reporting tool allowing users to report inappropriate content on this service.
- The reporting tool shall be easy-to-use and easy-to-find via a link or button on the site.
- The reporting tool must not allow anonymous reports but at least require providing the email address.

National examples:

- In Hungary, Magyar Telekom’s service Iwiw.hu provides an online reporting tool to its users (see screenshot 1), which is easy-to-use and easy-to-find (see screenshot 2). It does not allow anonymous reports, but users have to indicate their user name. The user ID is automatically attached to the report.

Jelentem

Ha úgy érzed, hogy a felhasználó megsértette az iWiW felhasználási feltételeit, ide írd le részletesen a problémádat.

1. Üzenetekkel kapcsolatos bejelentés
2. Adattal kapcsolatos bejelentés
 - 2.1. Személyiségi jogokat sértő adatlap
 - 2.2. Védjegyet sértő adatlap
 - 2.3. Fiktív adatlap
 - 2.4. Közz szereplő, történelmi személy adataival visszaélés
 - 2.5. Feltört adatlap
 - 2.6. Mások vallását, nemzeti, nemzetiségi, szexuális hovatartozását gyalázó, sértő, provokáló adatlap
 - 2.7. Szexuális tartalmú, obszcén, egyéb közízlést sértő és erkölcsi méltóságot sértő adatlap
 - 2.7.1. Fénykép

* Kifogásolt kép neve

Probléma leírása

Mégsem

Közös ismerősök

Lehetséges ismerősök

Számmisztika

Mióta vagytok ismerősök:	2006.02.04.
Mikor regisztrált az iWiW-en:	2006.01.03.
Mikor lépett be utoljára:	2013.07.18. 15:31
Egyedi azonosító (userID):	8469947

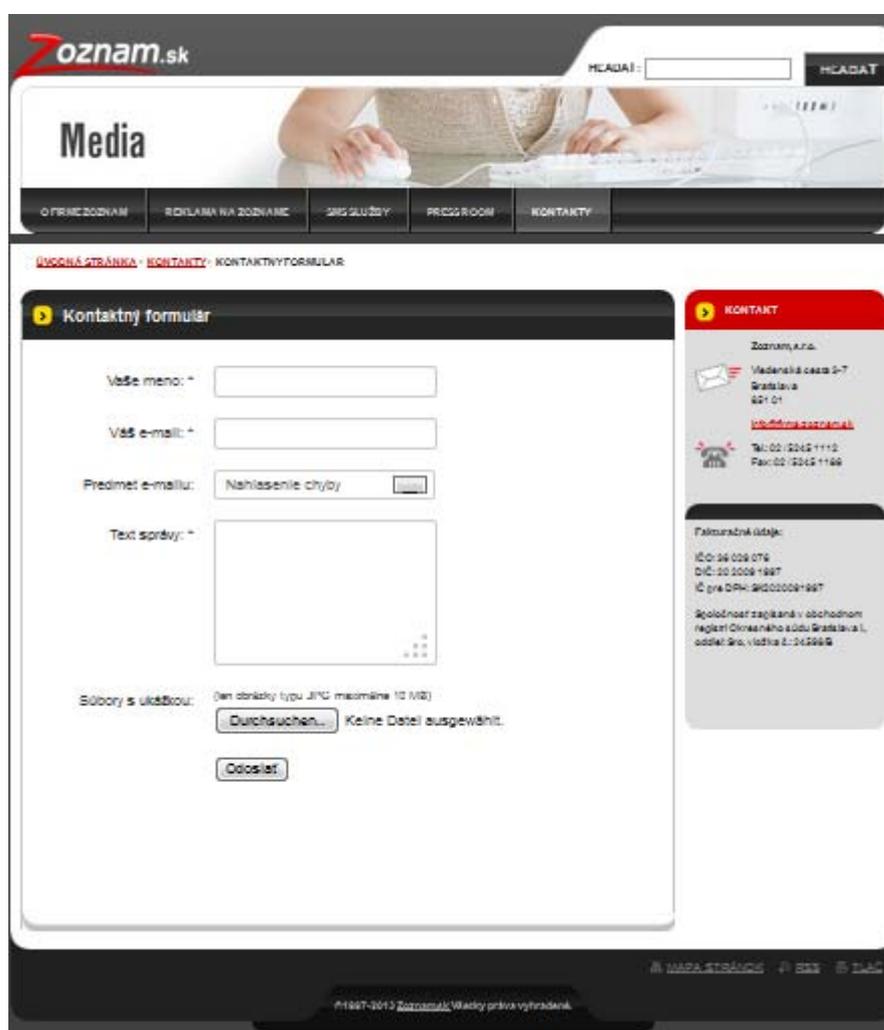
▶ Jelentem

▶ Kapcsolat törlése

- In Poland, T-Mobile Poland provides a reporting tool for its cloud service “MyDisk” (see screenshot).



- In Slovakia, Slovak Telekom’s service Zoznam.sk provides a reporting tool, including the possibility to attach documents to the report (see screenshot; www.media.zoznam.sk/kontakty/kontaktny-formular/?m=topky).



Committed measure 5:

- Complaining User will receive an automatic response. The automatic reply should include: a description of the investigation process, reference to the terms of service and standard times of dealing with the complaint. The means of response can be email, the messaging function within the service or other.

National examples:

- In Hungary, all users who send a report to Magyar Telekom's service lwiw.hu receive an automatic response, saying in Hungarian language: 'Dear User, Your notification has been received. We will investigate it and if necessary proceed in accordance with the Terms and Conditions iWiW. Thank you for your remark! iWiW Engineering' (rough translation).
- In Slovakia, all users who send a report to Slovak Telekom's service Zoznam.sk receive an automatic response, saying in Slovakian language: 'Dear user, thank you for reporting inappropriate content. Thanks to your report we can better manage inappropriate and offensive content on our sites. The content will be internally investigated within 24 hours. If the content is not liable with our terms of service and is not appropriate, it will be deleted. We are not always able to inform you about the results of this investigation. Your email address will not be used for any other use' (rough translation).

Committed measure 6:

- These measures are based on effective internal processes with clear responsibilities and standard processes, which ensure that complaints are dealt with in a short timeframe.

National examples:

- For example in Slovakia, Slovak Telekom's guidelines for a standard process are as follows:
Level 1: A user's report on inappropriate content is forwarded to the head of the respective product service. This colleague is responsible for the effective management of that report. All persons who deal with reports are instructed to investigate the report within 24 hours.
Level 2: The colleague, who is responsible to manage the report, involves the legal department in the investigation and, following, directly responds to the user who has sent the report.

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.

See 'committed measure 1' and national examples above.

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).

See 'committed measure 2, 3 and 4' and national examples above.

<p>3. <u>Where</u> is the reporting button/ mechanism located? (tick any that apply)</p> <p>(no) <i>On each page of the website/service</i> (no) <i>Close to the point where such content might be reported</i> (no) <i>In a separate location such as a safety page</i> (no) <i>In a browser extension</i> (no) <i>In a separate app for a connected device</i> <input checked="" type="checkbox"/> <i>Other (please specify):</i></p> <p>Specified by each subsidiary company, as most appropriate in the respective product or service. See 'committed measure 2, 3 and 4' and national examples above.</p>
<p>4. <u>Who</u> may use such a reporting mechanism? (tick any that apply)</p> <p>(no) <i>Only registered user/profile in which content is located</i> (no) <i>All registered users of the product/service?</i> (no) <i>Everyone including non-users, e.g. parents/teachers who are not registered for the service</i> <input checked="" type="checkbox"/> <i>Other (please explain):</i></p> <p>Specified by each subsidiary company, as most appropriate in the respective product or service. See 'committed measure 2, 3 and 4' and national examples above.</p>
<p>5. Which <u>kinds of content</u> can users report?</p> <p>Specified by each subsidiary company, as most appropriate in the respective product or service. See 'committed measure 2, 3 and 4' and national examples above.</p>
<p>6. Which of the following information do you provide to users? (tick any that apply)</p> <p>(no) <i>Advice about what to report</i> (no) <i>Advice about how to make a report</i> (no) <i>Pre-defined categories for making a report</i> <input checked="" type="checkbox"/> <i>How reports are typically handled</i> <input checked="" type="checkbox"/> <i>Feedback to users</i> (no) <i>Other website/external agency for reporting abuse/ misuse content?</i> <input checked="" type="checkbox"/> <i>Other (please specify):</i></p> <p>Specified by each subsidiary company, as most appropriate in the respective product or service. See 'committed measure 2,3 and 4' and national examples above.</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>Further means beyond Deutsche Telekom Group's commitment can be applied by each subsidiary company individually.</p>
<p>8. Please outline briefly any other procedures or programmes offered by your service <u>not</u></p>

detailed above that relate to abuse /misuse.

See 'committed measure 6' and national examples above.

Further means beyond Deutsche Telekom Group's commitment can be applied by each subsidiary company individually.

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.

Based on Deutsche Telekom Group's approach, each subsidiary company specifies its measures individually:

The GSMA Mobile Alliance against Child Sexual Abuse Content² sets out standards for mobile services on how to effectively fight child sexual abuse material online. In order to share the good practice of these standards, Deutsche Telekom worked jointly with other operators to publish the GSMA Transparency Paper.³ Deutsche Telekom commits to the following standards to ensure effective takedown of child abuse material:

Committed measure 1:

- The corporate Child Online Safety Webpage provides links to the INHOPE reporting app, which enables users to report child abuse material via their Smartphone.

National examples:

- In Slovakia, Slovak Telekom provide a link to the eSlovensko reporting app:

² www.gsma.com/publicpolicy/myouth/mobiles-contribution-to-child-protection/mobile-alliance

³ www.gsma.com/publicpolicy/wp-content/uploads/2012/07/Mobilecontributiontonoticeandtakedown.pdf

www.telekom.sk/english/corporate-responsibility/child-safety

- In Greece, OTE provides a link to the Safeline.gr reporting app: www.safeline.gr/en/reports/android-mobile-application-0

Committed measure 2:

- Corporate web pages provide the link to the national INHOPE node or equivalent for user reports on suspected child sexual abuse content online.

National examples:

- In Germany, Telekom Deutschland provides the link to FSM.de: www.t-online.de/rechtswidrige-homepage-/id_12716852/index
- In Austria, T-Mobile Austria provides a link to Stopleveline.at: www.t-mobile.at/unternehmen/das_unternehmen/Kinder_und_jugendschutz.php
- In Croatia, Hrvatski Telekom provides the link to HrabriTelefon: www.t.ht.hr/odgovornost/zastita-djece_poveznice.asp

Committed measure 3:

- Deutsche Telekom supports the work of the INHOPE node or equivalent in the respective country.

National examples:

- In Slovakia, Slovak Telekom's supports the NGO eSlovensko, which is managing Stopleveline.sk (examples can be found on: www.telekom.sk/english/corporate-responsibility/child-safety).
- In Germany, Telekom Deutschland's is member of ECO and FSM, both national INHOPE nodes (e.g. referring to FSM: www.telekom.com/verantwortung/gesellschaftliche-verantwortung/medienkompetenz/jugendschutz/18136).
- In Greece, OTE and COSMOTE support the Helpline "YpoSTIRIZO" 800 11 800 15 / help@saferinternet.gr (Greek Safer Internet Centre), is supported. The helpline is the national representative for Greece of the European network of helplines, within the INSAFE network.

Committed measure 4, 5 and 6:

- There are clear internal processes and responsibilities in Deutsche Telekom, to ensure that reports received on child sexual abuse material online are appropriately dealt with. Such reports should not be investigated by own staff.
- Deutsche Telekom cooperates with law enforcement and INHOPE or equivalent in the fight against child sexual abuse material online, in order to facilitate prompt prosecution and law enforcement regarding suspected content brought to the company's acknowledgement.
- For own consumer hosting or digital content platforms, liaison points of contact with law enforcement and INHOPE or equivalent are ensured, in order to receive their reports on identified child sexual abuse content on own services.

National examples (roughly summarized):

- In Greece, OTE and COSMOTE forward received reports to the competent department in order to examine if OTE is hosting the relevant site. If OTE is the host, then the legal department takes on and communicates the report to the authorities in order for them to take action. The authorities shall take a decision with respect to the case and forward a command to the legal department of OTE and COSMOTE. The legal department shall forward this command to the competent department and OTE shall then act according to the Authorities' instructions.
- In Germany, there is a coordinated process involving hotlines, authorities and Telekom Deutschland's departments that deal with abuse and legal matters. Hotlines receive reports and notify stakeholders, within Telekom Deutschland there is a clear contact point and an aligned process of legal assessment. National authorities are fully involved to ensure investigation and prosecution.

Committed measure 7:

- Contractual agreements are used to require 3rd party content providers/ partners with whom there are commercial relationship to follow equivalent notice and takedown rules.

National examples:

- Liability clauses are included in contractual agreements of those subsidiary companies that provide b2b hosting services, e.g. Telekom Deutschland, Slovak Telekom, OTE.

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)

(no) *Company-own hotline reporting button or telephone number*

Link or button for external national or regional INHOPE hotline

(no) *Emergency services*

(no) *Law enforcement agency*

(no) *Other external agency (please specify):*

See 'committed measure 2' and national examples above.

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

See 'committed measure 4' and national examples above.

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)

(no) *Links to relevant child welfare organizations/specialist providers of advice*

(no) *Other confidential helplines/support services*

(no) *Law enforcement agencies*

X *INHOPE*

(no) *Other (please specify):*

See 'committed measure 2' and national examples above. Further means beyond Deutsche Telekom Group's commitment can be applied by each subsidiary company individually.

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?

See 'committed measure 2' and national examples above. Further means beyond Deutsche Telekom Group's commitment can be applied by each subsidiary company individually.

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.

This chapter refers to products and services that allow users to share their private data with each other. Such services are not in Deutsche Telekom's focus and, thus, potential impact to increase child online safety is very limited.

Deutsche Telekom is committed to improve age appropriate privacy settings through implementing the GSMA 'Privacy Design Guidelines for Mobile Application Development'⁴.

The guidelines had been developed in the context of the GSMA Mobile Privacy Initiative⁵ and help to drive a more consistent approach to user privacy across mobile platforms, applications and devices.

They establish privacy rules for e.g. social networking and social media apps, or the application of mobile advertisement. In a dedicated chapter on children and adolescent, the principles demand to, inter alia, tailor applications to appropriate age ranges and to have a location default setting that prevents users from automatically publishing their precise location.

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?

See explanation above.

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

⁴ www.gsma.com/publicpolicy/privacy-design-guidelines-for-mobile-application-development

⁵ www.gsma.com/publicpolicy/mobile-and-privacy/gsma-mobile-privacy-initiative

X *Not applicable (please explain):*

See explanation above.

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)

Not applicable—see explanation above

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?

Not applicable—see explanation above

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.

Not applicable—see explanation above

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.

Based on Deutsche Telekom Group's approach, each subsidiary company specifies its measures individually:

Committed measure 1:

- To improve transparency and demonstrate responsibility, each national entity will appoint a Child Safety Officer. This officer is coordinating child online safety internally and serves as a central point of contact for external requests, e.g. by non-governmental organisations and authorities.

National examples:

- The appointed Child Safety Officers are usually located in the Public Policy, Regulatory, Corporate Responsibility, Communication or Legal Department. They closely interact with a variety of functions and departments, e.g. Marketing, which is required to effectively ensure child online safety.

Committed measure 2:

- For better information of the public and stakeholders, all national companies will provide a dedicated Child Online Safety Webpage as easy to reach and central hub for parents, kids and interested stakeholders. This webpage will provide information on the company's services and products offered to increase child online safety – for example to promote the use of parental control tools. Also, the webpage will raise awareness on topics that are relevant for child online safety and provide information about the company's engagement and good practices.

National examples:

- T-Mobile Austria: t-mobile.at/unternehmen/das_unternehmen/Kinder_und_jugendschutz.php
- Hrvatski Telekom: t.ht.hr/odgovornost/zastita-djece.asp
- Telekom Deutschland: telekom.com/jugendschutz
- Magyar Telekom: www.telekom.hu/rolunk/vallalat/fenntarthatosag/tarsadalom/tarsadalmi_szerepvallalas/gyermekvedelem
- Slovak Telekom: telekom.sk/english/corporate-responsibility/child-safety

Committed measures 3:

Deutsche Telekom's subsidiaries are continuously engaging in a variety of different projects to further education and awareness in the context of the respective national culture and education systems. Such initiatives include inter alia:

- Running own public campaigns and events
- Provisioning of awareness raising material
- Support of governmental initiatives
- Support of NGOs engaged in the field
- Facilitating the work of schools and teachers

National examples:

- A broad overview on the various activities is provided in Deutsche Telekom Group's corporate responsibility report, which is published annually (For 2012: cr-report.telekom.com/site13/customers/protecting-minors; CR-report for 2013 will be published within the next months).
- Deutsche Telekom Group subsidiary companies have long standing commitments and support plenty of NGOs across the EU: cr-report.telekom.com/site13/customers/protecting-minors#atn-1362-2273
- In Greece, OTE and COSMOTE have launched in the scope of the Safer Internet Day, a campaign which promotes the safer use of the internet. The kick-off event was organized in the biggest Mall in Greece (press release attached). The campaign is entitled (in Greek language) 'In the Internet fairyland, we want no villains' and includes the provisioning of awareness raising material (leaflet screenshot attached). Beyond this, OTE and COSMOTE supported the work of schools and teachers. OTE and COSMOTE support the Adolescent Health Unit's awareness sessions taking place in schools (in 2012, 110 sessions in schools were supported) and online safety workshops of the Cyber Crime Unit, which addressed parents and teachers (in 2012, 29 workshops were supported) (p. 42-45: cosmote.gr/content/en/attached_files/Company/OTE-COSMOTE-corporate-responsibility-2012.pdf).



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- In Slovakia, Slovak Telekom runs the kids portal “Rexik” (rexik.zoznam.sk), which provides absolute safe and positive content for children and promotes educational material such as the brochure “How to protect ourselves and our children in the web” (supported by the European Commission; sheeplive.eu/sites/default/files/children_in_the_web_0.pdf). On its web portal Topky.sk (topky.sk/se/100335/Bezpecny-internet) Slovak Telekom provides useful information and news about the safe use of the internet. Beyond this Slovak Telekom and eSlovensko are long-standing partners in the project “Sheeplive”. This popular cartoon increase awareness on child safety in the internet, educating both children and their parents. Sheeplive.eu from Slovakia has been recognised as one of the most innovative e-content products worldwide at the UN-based World Summit Award. Slovak Telekom – a subsidiary of Deutsche Telekom Group – and the NGO eSlovensko are long-standing partners in this project (sheeplive.eu).
- In Croatia, Hrvatski Telekom supported within 2013 the initiate of the Association of Teachers which is active in education on online safety (ucitelji.hr/Sigurnijiinternet/Sigurnijiinternet2013.aspx). Besides this, the national champagne “Sigurniji internet za djecu i mlade” was supported, which furthers safe internet (ucitelji.hr/Sigurnijiinternet/Sigurnijiinternet2013.aspx).
- In Austria, T-Mobile Austria is engaged in the „Forum Mobilkommunikation“ (fmk.at/Schule) and provides educational material based on the „Handy-Kinder-Kodex“ (handykinderkodex.at). Besides this, T-Mobile provides guidebooks on his website (t-mobile.at/pdf/kinderschutz/Smartphone---Elternratgeber-des-Wiener-Bildungsservers.pdf ; t-mobile.at/pdf/kinderschutz/FMK_Smartphone_TMoble_web.pdf). To further promote children’s media skills, T-Mobile provides useful information in its blog (e.g. on blog.t-mobile.at/2013/09/16/zeit-fur-eine-digitale-schulbuchaktion) and via the T-Mobile portal “Connected Kids” (connected-kids.at).
- In Germany, Telekom Deutschland runs the kids portal (kids.t-online.de), which provides absolute safe and positive content for children – including categories such as games, politics, knowledge, entertainment etc. as well as the search machine for kids fragFinn.de. The letter has continuously supported by Telekom and provides a a protected surf room for children with a protected online space without inappropriate content. Since November 2012, the fragFINN app has been offering a child-friendly browser for smartphones and tablets. In 2012 already, Teleom has been involved in various collaborations, including "Youth and cell phones," which promotes media skills among children and young people. We plan to continue our support for this initiative as well (<http://www.cr-report.telekom.com/site13/customers/protecting-minors#atn-1362-2273>).
- In Hungary, Magyar Telekom is engaged in the “Mobilsuli” project, which furthers media literacy of children. Another example is Magyar Telekom’s support of “Bűvösvölgy”, the Media Literacy Center of the National Media and Communications Authority. Further info are available inter alia on page 101: www.telekom.hu/static/sw/download/Sustainability_Report_2012.pdf.

<p>1. Does your company provide its own <u>educational resources</u> aimed at any of the following groups?</p> <p><input checked="" type="checkbox"/> Younger children, i.e. under 13s <input checked="" type="checkbox"/> Teenagers <18s <input checked="" type="checkbox"/> Parents and carers <input checked="" type="checkbox"/> Teachers and other adults (no) Others (please specify):</p> <p>The target group depends on the specific national measure, which is applied individually by each subsidiary company. Examples of these measures are listed above and they cover all of the listed age groups.</p>
<p>2. Which of the following <u>topics</u> are included within your own company educational materials? (tick any that apply)</p> <p><input checked="" type="checkbox"/> Online safe behaviour (no) Privacy issues <input checked="" type="checkbox"/> Cyberbullying (no) Download and copyright issues <input checked="" type="checkbox"/> Safe use of mobile phones (no) Contact with strangers <input checked="" type="checkbox"/> Other topics (please specify): <i>Safe and responsible use of mobile and fixed internet</i></p> <p>The topic depends on the specific national measure, which is applied by each subsidiary company individually. Examples of these measures are listed above and they mainly cover the marked topics.</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> <p>(no) Documentation provided with product/contract on purchase/first registration (no) A required presentation by salesperson completing sale (no) Displays/leaflets positioned prominently in stores (no) Notification by email / on-screen statement / other means when product or contract is purchased or first registered (no) Prominent notifications, resources or pop ups on website (no) Helpdesk (telephone or online) <input checked="" type="checkbox"/> Other (please specify):</p> <p>See above, including national examples of applied methods. Beyond these, promotional measures referring to further usage of parental controls are described in chapter 2.</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>

See above, including national examples of links to other external organisations.

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?

See listed above, including national examples of campaigns and industry partnerships.

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.

See above, including partnerships with NGO, civil society and other educational agencies.

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.

See above, including national examples of media literacy initiatives.

8. Please provide details of any advice and supports to encourage parents or teachers to talk to their children/ pupils about the opportunities and risks arising from their use of the internet.

See above, including national examples that support encouraging parents and teachers to talk to their children/pupils.

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

Means beyond Deutsche Telekom Group's commitment can be applied by each subsidiary company individually.

ANNEX

COUNTRY	PRODUCT/SERVICE	STATUS	COMMENTS
Austria (T-Mobile Austria)	Mobile network operator and connectivity provider.	The committed set of 25 measures has been almost completed. Only one measure is still work in progress.	Following measure is still work in progress: The consumer cloud service does not provide an online reporting tool yet (commitment in Chapter 3). Since this service is provided by Telekom in Germany, the necessary adjustments will be conducted there.
Croatia (Hrvatski Telekom)	Mobile and fixed network operator and connectivity provider. Online services and online content provider (minor business focus).	The committed set of 25 measures has been widely completed. Several measures are still work in progress.	Following measures are still work in progress: Adequate online reporting tool not provided yet (commitment in Chapter 3). Internal processes are not formally optimized yet, in order to comply with the committed measures 4,5 and 6 (commitment in chapter 4). Despite this, legal requirements are fully met.
Czech Republic (T-Mobile Czech Republic)	Mobile and fixed network operator and connectivity provider.	The committed set of 25 measures has been mostly completed. A few measures are still work in progress.	Following measures are still work in progress: No child safety price plan in mobile communications, which allows customers to block internet access, offered yet (commitment in chapter 2). For fixed Internet access, no service is offered yet which allows customers to filter inappropriate content from open Internet resources (commitment in chapter 2).
Germany (Telekom Deutschland)	Mobile and fixed network operator and connectivity provider. Online services and online content provider (minor business focus).	The committed set of 25 measures has been mostly completed. Several measures are still work in progress.	Following measures are still work in progress: The consumer cloud service does not provide an online reporting tool yet (commitment in Chapter 3). The corporate Child Online Safety Webpage does not provide yet the link to the INHOPE reporting app, which enables users to report child abuse material via their Smartphone (commitment in

			chapter 4)
Greece (OTE, COSMOTE)	Mobile network operator and connectivity provider. Fixed network operator and connectivity provider.	There has been significant progress, but further steps to complete the 25 measures are required.	<p>Following measures are still work in progress:</p> <p>Content classification of e-books which are suitable only for adults, will be finalized in February 2014 (commitment in chapter 1).</p> <p>No dedicated 'child safety price plan' in mobile communications offered yet (however, parents have already the possibility to chose a tariff without internet access) (commitment in chapter 2).</p> <p>No information on the mobile parental control tool provided yet in own-branded product information (commitment in chapter 2).</p> <p>The link to the national INHOPE node for user reports on suspected child sexual abuse content online will be included in the corporate websites soon (commitment chapter 4).</p> <p>Child Online Safety Website will be launched soon, including all relevant information (commitment chapter 5).</p>
Hungary (Magyar Telekom)	Mobile and fixed network operator and connectivity provider Online services and online content provider (minor business focus).	There has been significant progress, but further steps to complete the 25 measures are required.	<p>Following measures are still work in progress:</p> <p>No child safety price plan in mobile communications offered yet (however, parents have already the possibility to chose a tariff without internet access). A dedicated 'child safety price plan' will be launched in 2014, including even more child safety features (e.g. Urgency Application) (commitment in chapter 2).</p> <p>No effective age verification system for UGC-platform, which also include adult content, installed yet. This is planned for Q1 2014 (commitment in chapter 2).</p> <p>Automatic response to users who send a report, does not indicate standard times of dealing with</p>

			complaints yet (commitment in chapter 3).
Netherlands (T-Mobile Netherlands)	Mobile network operator and connectivity provider. Online services and online content provider (minor business focus).	There has been significant progress, but further steps to complete the 25 measures are required.	<p>Following measures are still work in progress:</p> <p>No parental control tool for mobile Internet access via Smartphones offered yet. As interim solution a filter tool of another provider will be promoted on TMNL's child safety webpage (launch in Q1 2014) (commitment in chapter 2).</p> <p>The consumer cloud service does not provide an online reporting tool yet (commitment in Chapter 3). Since this service is provided by Telekom in Germany, the necessary adjustments will be conducted there.</p> <p>No dedicated 'child safety price plan' in mobile communications offered yet (however, parents have already the possibility to chose a tariff without internet access) (commitment in chapter 2).</p> <p>Internal processes will be formally optimized in Q1 2014, in order to comply with the committed measures 4,5 and 6 (commitment in chapter 4). Despite this, legal requirements are fully met.</p> <p>Support of the national INHOPE node or equivalent will be formally completed in Q1 2013 (commitment in chapter 4).</p> <p>Child Online Safety Website will be launched in Q1 2014, including all relevant information (commitment chapter 5).</p>
Poland (T-Mobile Polska)	Mobile and fixed network operator and connectivity provider	There has been significant progress, but further steps to complete the 25 measures are required.	<p>Following measures are still work in progress:</p> <p>No dedicated 'child safety price plan' in mobile communications offered yet (commitment chapter 2).</p> <p>No effective age verification for prepaid customers accessing adult content installed yet (commitment chapter 2).</p>

			<p>Information on the mobile parental control tool not provided yet in own-branded product information (commitment in chapter 2).</p> <p>No promotion of parental control tools via e-channel, child safety website and own manuals yet (commitment in chapter 2).</p> <p>No automatic response provided yet when users send online report and internal responsibilities to responds need to be formally clarified (commitment in chapter 3).</p> <p>Internal processes will be formally optimized in Q1 2014, in order to comply with the committed measures 4,5 and 6 (commitment in chapter 4). Despite this, legal requirements are fully met.</p> <p>Clauses will be included in contractual agreements soon, to require 3rd party content providers/ partners with whom there are commercial relationships to follow equivalent notice and takedown rules (commitment in chapter 4).</p>
<p>Romania (RTC, COSMOTE)</p>	<p>Mobile network operator and connectivity provider Fixed network operator and connectivity provider</p>	<p>RTC has been widely completed the committed set of 25 measures. Several measures are still work in progress.</p> <p>COSMOTE has made significant progress, but further steps to complete the 25 measures are required.</p>	<p>Following measures are still work in progress:</p> <p>No parental control tool for fixed Internet access offered yet. As interim solution a filter tool of another provider is promoted on RTC's corporate website (commitments in chapter 2).</p> <p>COSMOTE does not offer a parental control tool for mobile Internet access via Smartphones yet (commitment in chapter 2).</p> <p>COSMOTE does not offer a dedicated 'child safety price plan' in mobile communications yet (commitment chapter 2).</p> <p>COSMOTE still needs to include the national INHOPE node for user reports on suspected child sexual abuse content online in its corporate websites (commitment chapter 4).</p>

			COSMOTE's internal processes will be formally optimized in Q1 2014, in order to comply with the committed measures 4 (commitment in chapter 4). Despite this, legal requirements are fully met.
Slovakia (Slovak Telekom)	Mobile and fixed network operator and connectivity provider. Online services and online content provider (minor business focus).	The committed set of 25 measures has been almost completed. Only one measure is still work in progress.	Following measures are still work in progress: Parental control tool for prepaid mobile customers will be available in February 2014 (commitment in chapter 2).