



Implementation Questionnaire

14 February 2014

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

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:

Telefonica, s.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

Germany, Spain and UK

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

Paid TV, fixed and mobile phones and internet

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

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Position: Social Innovation Manager

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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 recognized 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.

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:

Telefonica has made it simpler for customers to report potentially illegal images of child abuse by ensuring the visibility of links to the national hotlines from its commercial web sites. For example, in Spain, Telefónica has developed together with the main Spanish operators a common icon that is on their website linking with Protégeles, the national hotline:

<http://www.crandsustainability.telefonica.com/en/ict/wary.php>.

<http://www.movistar.es/particulares/atencion-cliente/gestion-lineas/internet/consejos-para-padres>.

In addition it has made an app available for smart phones and tablets to facilitate reporting when using internet through these devices.

In Germany, Telefónica is an active member of the Centre for Child Protection on the Internet, which is currently developing a nationwide reporting tool in cooperation with the German ICT-Industry.

<https://www.telefonica.de/page/18322/weiterfuehrende-informationen.html>.

Telefonica UK continues to actively support the work of the Internet Watch Foundation:

<http://www.o2.co.uk/parents>.

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:

If illegal content were to be identified on servers hosted by Telefónica, it would be removed quickly, in accordance the relevant notice and take-down provisions. Telefónica has been a member of the GSMA Mobile Alliance Against Child Sexual Abuse Content since 2008. It works with national law enforcement and national hotlines to enable reporting and removal of images of child abuse (except in Germany due to local legislation). In 2013 Telefonica supported the expansion of the Internet Watch Foundation to enable it to take a more proactive role in finding and removing images of child abuse from the Internet.

3. Do you provide any *information, educational resources or advice for users* in any of the following areas?

(tick as many as apply)

<p><input type="checkbox"/> <i>Content classification or labeling guidelines</i></p> <p><input type="checkbox"/> <i>How to block or restrict access to content</i></p> <p><input type="checkbox"/> <i>How to report or flag content as inappropriate</i></p> <p>X <i>Safe searching</i></p> <p><input 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>Telefónica supports several educational campaigns in Germany, e.g. a search engine for children: http://www.fragfinn.de/kinderliste.html</p>
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4. Where is your company's *Acceptable Use Policy (AUP)* located?

<p>All the policies are always placed on the bottom of the websites.</p>
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5. Does the AUP or separate give clear guidelines with which user generated content must comply (including details about how users are expected to behave and what is not acceptable)?

<p><input type="checkbox"/> <i>Yes</i></p> <p><input type="checkbox"/> <i>No</i></p> <p>X <i>Not applicable (please explain): Telefónica do not provide services where users can generate their own content.</i></p> <p>If yes, please identify relevant policy:</p>
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6. Do you provide notice about the *consequences for users* if they post content which violates terms of service or community guidelines?

Yes

No

X *Not applicable* (please explain): Telefónica do not provide services where users can generate their own content.

If yes, please identify relevant policy:

7. Please provide examples of markets/countries were those solutions have been deployed.

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:

During 2013 Telefónica launched a new comprehensive parental control service in Brazil which works across all Internet connected devices.

<http://segurancaonline.vivo.com.br/portal/hotsite/public/proteja-sua-familia>. We are working to launch the service in UK and Spain during 2014.

Telefonica's UK public WiFi service does not provide access to 18 rated internet content. This is the link to the current parental control that we provide in Telefónica Spain for Broadband services

<https://www.movistar.es/particulares/internet/seguridad/listado-completo/ficha/canguro-net-plus>

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

The current parental control that we offer in Spain, it is a web based service that controls every single device connected to the WIFI at home including categories of contents to be blocked and also it is possible to block URLs. Blocks advertising and download of some files, and valid in any browser.

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*

<https://www.movistar.es/particulares/internet/seguridad/listado-completo/ficha/canguro-net-plus>

<http://famiadigital.net/>

[Please provide details including links or screenshots as relevant]

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?

5. Please provide examples of markets/countries where those solutions have been deployed.

We have already launched a comprehensive parental control in Brazil, that works on every device with internet connection outside and in the house.

<http://segurancaonline.vivo.com.br/portal/hotsite/public/proteja-sua-familia>.

It is planned to be launched in Spain and UK during 2014.

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 behavior.
- 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.

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).

In Spain we have a service called Nemesys <http://www.movistar.es/nemesys>, to provide information to customers related with any misuses of the services of Telefonica. This service is run by Telefonica

We also include a link to the national hotline Protégeles on our websites

<http://www.crand sustainability.telefonica.com/en/ict/wary.php>

<http://www.movistar.es/particulares/atencion-cliente/gestion-lineas/internet/consejos-para-padres>

<http://familiar digital.net/>

In Germany, we include on the website a link to national hotline

<https://www.telefonica.de/page/18322/weiterfuehrende-informationen.html>

In UK, we include on the website a link to national hotline from

<http://www.o2.co.uk/parents>

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):*

Telefonica Spain has developed an app available for smartphones and tablets to allow reporting while using these devices. It is called "Protegete" and it is an outcome of the collaboration with the main Spanish operators together with Protégeles, the national node of the Inhope and Insafe.

The icon on websites is placed on the security sites or on the microsites related with child protection.

Our businesses in Spain, Germany and UK carry links to the national hotline on their commercial 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): It is available through the market store of Apple and Android for everybody.*

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

In Spain, anything that they think may be illegal or harmful for kids.

UK hotline is for reporting potentially illegal images of child abuse.

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):

Through the App we provide information about what can be reported. In the services handled by Telefónica, it is send a notification to the person who has report to inform about the reception of the report. In those cases where the icon is linked with national hotlines, reports are anonymous and Telefonica is not responsible for handling the report.

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

The app "Protégete" available on App stores (Apple and Android)

[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.

9. Please provide examples of markets/countries were those solutions have been deployed.

In Spain the App
UK, Spain and Germany icons on websites as stated above.

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): App for smartphones and tablets*

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

Following our internal policy:

- In the event that Illicit Content is found on sites owned by Telefónica in the space assigned or contracted with the customer, or in any other way, upon consultation and authorisation from the Legal General Secretary, Telefónica: (i) shall immediately inform the Competent Authority of the facts, whenever this is appropriate under the Applicable Legislation, giving notice that the Illicit Content is to be removed; and (ii) it shall remove this Content in the shortest possible amount of time, and in any case within 72 hours following assumption of Actual Knowledge, unless the Competent Authority or the Applicable Legislation indicates otherwise.
- Whenever there is no room for doubt that the customer, or the relevant party in

question, has been the victim of an attack by a third party (for example, in the case of a hacker using the customer's account to upload Illicit Content) Telefónica shall report said incident to the customer stating that he should rectify it himself. Said message will notify him that his site could have been manipulated by third parties and that, should 72 hours elapse and no correction be observed then steps will be taken to safeguard and Remove the Content.

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?

5. Please provide examples of markets/countries were those solutions have been deployed.

Telefónica in Spain and UK policy to block access to illegal URLs as defined by the Internet Watch Foundation <https://www.iwf.org.uk/>
Germany is not able to block by national law.
Telefónica Germany has its own telephone hotline for all customers who have questions in the field of child protection.

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?

TSA Data protection policy
O2 Privacy Policy

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)

Telefónica Germany provides prepaid mobile phone services for customers from 16. These products are optimized for teenagers.

Telefónica Spain has opt-in on adult content on prepaid phones and in any case, by law it is forbidden to sell mobile phones to kids.

Children and Mobile phones - UK Policy NB Under 16s are not targeted in TUK Marketing

<http://intranet.uk.pri.o2.com/SupportandSystems/Supportingbusinessops/CIC/TO2UKInfoPolicies/Pages/Data-Protection.aspx>

<http://www.o2.co.uk/termsandconditions/privacy-policy>

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):*

[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?

X *Tips/advice to users at the point of setting privacy options*

FAQs

x *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):

Legal Disclaimers

[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.

Privacy Dashboards (Germany/Spain/UK)

<http://www.o2.co.uk/termsandconditions/privacy-policy>

6. Please provide examples of markets/countries where those solutions have been deployed.

UK, Germany, Spain

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

<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</p> <p><input checked="" type="checkbox"/> Teenagers <18s</p> <p><input checked="" type="checkbox"/> Parents and carers</p> <p><input checked="" type="checkbox"/> Teachers and other adults</p> <p><input type="checkbox"/> Others (please specify):</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</p> <p><input checked="" type="checkbox"/> Privacy issues</p> <p><input checked="" type="checkbox"/> Cyberbullying</p> <p><input checked="" type="checkbox"/> Download and copyright issues</p> <p><input checked="" type="checkbox"/> Safe use of mobile phones</p> <p><input checked="" type="checkbox"/> Contact with strangers</p> <p><input type="checkbox"/> Other topics (please specify) Latest trends on ICT....</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>

- x Documentation provided with product/contract on purchase/first registration
 - A required presentation by salesperson completing sale
- x 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
- x Helpdesk (telephone or online)
 - Other (please specify):

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

Telefónica works with local nodes of Inhope and Insafe, relevant welfare organisations and LEA in any country where they are.

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?

We have recently launch a comprehensive portal in cooperation with EUN, and the Interactive Generation forum, already available in Spanish (<http://famiadigital.net/>) and English (<http://digitalfamily.eu/>)

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.

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.

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.

Telefónica Germany supports an initiative which is providing educational material for schools, <http://www.medien-in-die-schule.de/>

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

We have a site on the Institutional website dedicated to education on ICT
<http://www.rcysostenibilidad.telefonica.com/es/tic/ciudadanos.php>
<http://www.crandsustainability.telefonica.com/en/ict/citizens.php>

In Germany we have a dedicated website for parents
<https://www.telefonica.de/page/18314/jugendschutz.html>

In UK we have a dedicated website for parents
<http://o2.co.uk/parents>

10. Please provide examples of markets/countries where awareness raising campaigns have been organized.

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			