

**FUNDACJA DZIECI NICZYJE (Nobody's Children Foundation)**

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## **Response to Child Safety and Mobile Phone Services Consultation Paper**

The comments below have been restricted to those areas where the *Nobody's Children Foundation* has relevant expertise to contribute to this paper.

<b>QUESTIONNAIRE on child safety and mobile phone services</b>
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### **Risks**

**1) Can you provide the Commission's services with figures and examples on risks raised by the use of mobile phones by children and young people?**

So far little research has been done in Poland on the use of mobile phones and the risk of harm to children. Below you can find some data collected from surveys conducted by different institutions.

According to the results of the study made by Opinion Polls Agency ESTYMATOR 72% of Polish people possess at least one mobile phone. The study was done in the period of March to May 2006,

covering 3724 respondents aged 13–80 years old. Majority of mobile owners are people aged 20–29. Over 91% of teenagers 13-19 own a mobile phone. Possession of a mobile in other age groups:

30 – 39 yrs – 90%

40 – 49 yrs– 77%

50 – 59 yrs – 60%

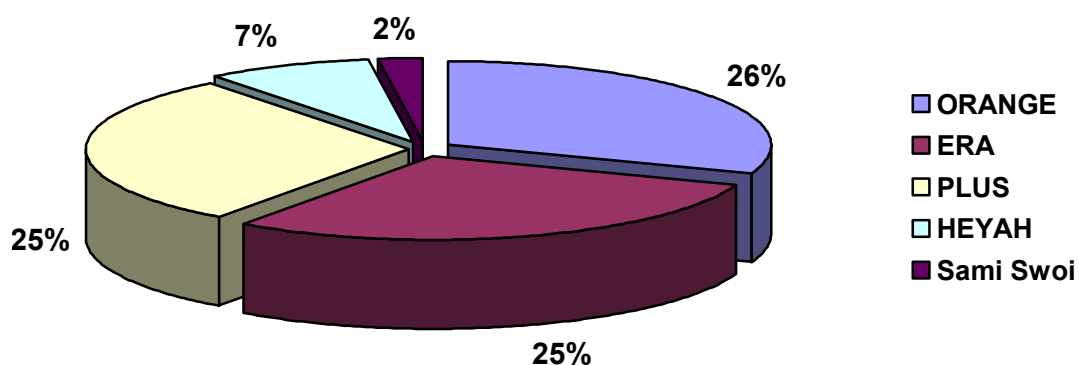
60 – 69 yrs – 42%

Over 70 yrs – 32%

There is a high correlation between possessing a mobile phone and education – people with university degree tend to have a mobile phone more often. 86% of population with university degree has a mobile, among those with primary school education only – 51%. Majority of mobile phone owners (79%) live in cities of 50.000-200.000 inhabitants. In big cities over 200.000 inhabitants 74% of people possess a mobile, in the country – only 67%.

46% of the Polish households have fixed line and at least 1 mobile phone. At the same time Poland remains at the top of EU countries where there is neither fixed line nor mobile phone in the household.

### Mobile operators in Poland



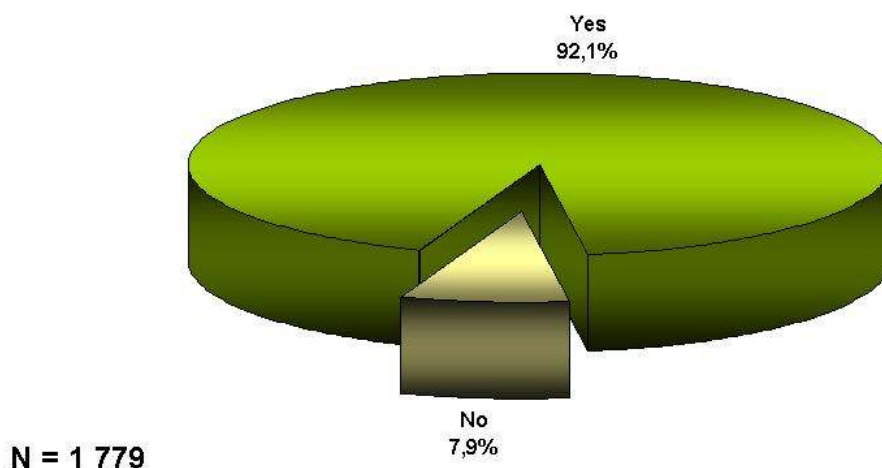
Most Polish children and young people with mobile phones use pre-paid system (POP, TAK TAK, HEYAH). Heyah remains the most popular with young people: 26% of teenagers 13-19 use Heyah services (<http://www.heyah.pl>) probably due to the advertising campaigns of this brand targeting this specific age group.

The survey made by the Research Institute ARC Rynek i Opinia, in cooperation with Fox Kids Polska and SFeRa modern media solutions showed that over 66% of children aged 7 – 14 years use mobile phones. Only 25% of young respondents in this age group declared not to use them. Only 9% of children wouldn't like to have a mobile phone. Apart from making phone calls children use mobiles mainly for sending sms (80% respondents), 35% declares downloading ring tones, and 25% - downloading screensavers and pictures. NOKIA is the most popular mobile handser, used by 43% of children. Siemens is on the second position (16% of respondents), followed by Motorola (11%).

### **Results from the online survey made by the *Nobody's Children Foundation* and Research Agency *Gemius***

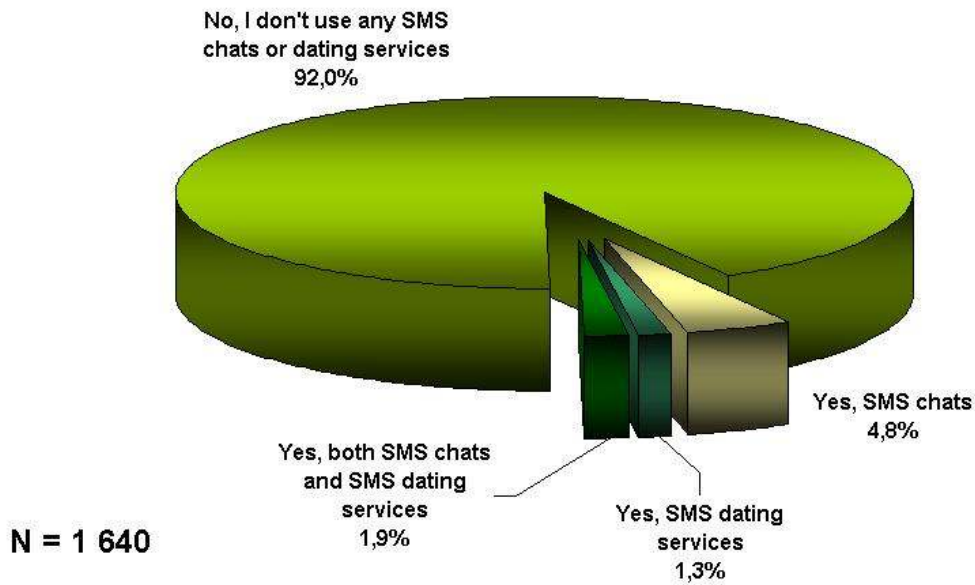
The survey was conducted on January 11<sup>th</sup>&12<sup>th</sup> 2006, through online questionnaires remitted randomly on sites using free site-centric audit stat.pl., covering 1779 Internet users aged 12-17.

### **Do you own a mobile phone?**



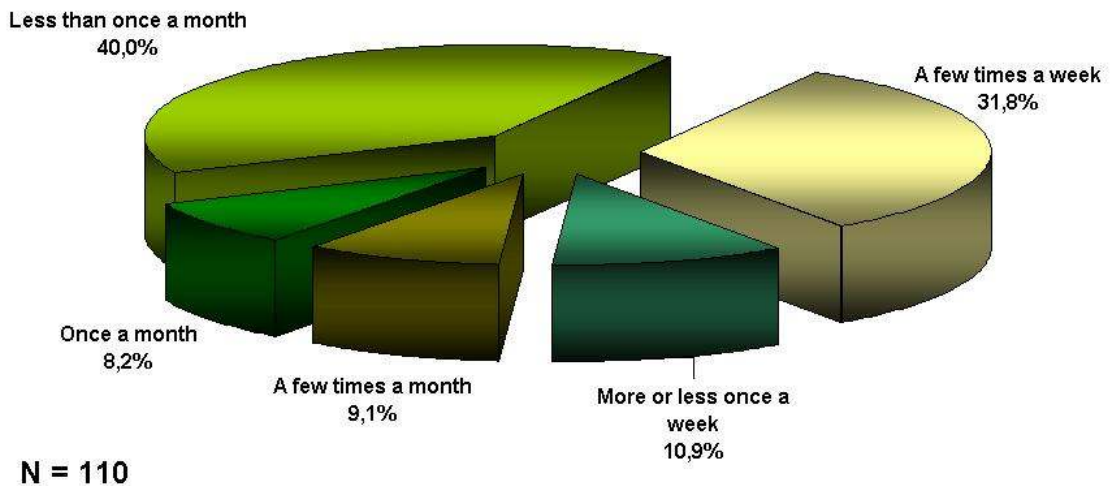
Source: gemiusReport, January 2006

## Do you use SMS chats & dating services?



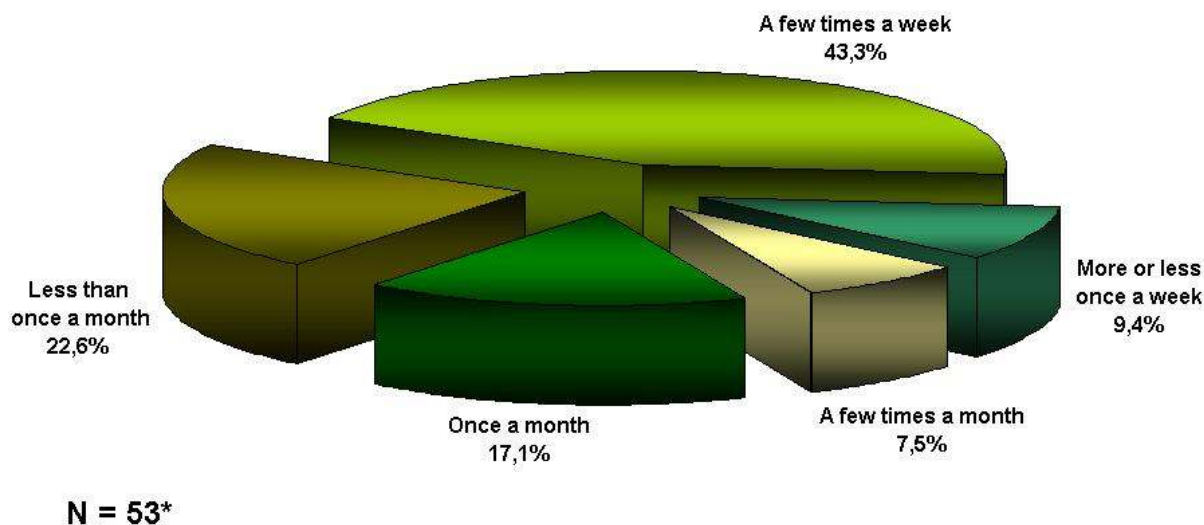
Source: gemiusReport, January 2006

## How often do you use SMS chats?



Source: gemiusReport, January 2006

## How often do you use SMS dating services?



\*Due to modest size of the sample, the data is only illustrative

Source: gemiusReport, January 2006

### Examples of risks

In case of mobile phones used by children and young people the room for parental control is definitely weaker, it is much more difficult to supervise the use of mobile than the use of PC. Children and young people often do not speak to their parents about mobile's use as they tend to consider this sphere as private. It is also important to stress that Polish parents are often unaware of the services the mobile can offer.

The risks that can be posed by mobile phones are:

- bullying via mobile phone and Internet,
- spam: messages inviting children to take part in games or referring them to certain websites,
- online grooming e.g. through chats,
- exposure to inappropriate content (pornography, violent content) and exchanging of inappropriate material with others,
- risks posed by integration of cameras into mobile handsets: circulation of photos of children, posting them to websites (e.g blogs) without their permission, taking pictures of violence,
- addictions,
- financial or legal consequences (enormous phone bills!).

## **2) Do you see specific risks associated with the use of pre-paid cards, which ones?**

Anonymity associated to pre-paid cards can pose serious risks. In Poland the users of pre-paid cards are not registered by name and address, so identification of such individuals is difficult (e.g. in cases of grooming).

It is important to note that in Poland there are no age restrictions when buying a so called start-up set with a SIM card. The prices of pre-paid cards and start-up sets are relatively low and therefore are very popular with children (most Polish children and young people use pre-paid system).

In terms of costs pre-paid system makes it more difficult for parents to supervise the use of mobile by a child – parents cannot control how much exactly children are spending on the mobile.

### **Regulatory framework**

3) Please identify which of the above risks are not covered by the current national regulatory, co- and self-regulatory frameworks.

4) Do you think the current balance between regulation/co-regulation and self-regulation is the right one?

### **Technical solutions**

5) What measures do you recommend in the different areas described below, and why? By whom should they be implemented?

#### **5a) Classification of commercial content.**

*Nobody's Children Foundation* thinks that a mixed system would prove best as regards classification of commercial content – rating of content should be done by both the content provider and then by an independent third party (taking into consideration cultural differences in each country).

#### **5b) Opt-in /opt out. Should the Opt-in (where the user has to explicitly request access to adult content rather by accessing it by default) approach be applied in all EU countries?**

Although more restrictive, the *NCF* supports “opt-in” option – users that want to access adult content would have to request it explicitly. “Opt-in” can be a more effective solution, as it excludes accidental use of some services and obviously allows more control for parents over children’s activities on the mobile (also in terms of costs control...)

#### **5c) Age verification: should Mobile network operators implement face to face identity check to determine the age of the user? Should this process also be applied when a customer buys a pre-paid card?**

Yes, there should be face to face check, but its implementation would pose great challenge to the mobile operators in Poland. This mechanism should be implemented both in case of post-pay and pre-paid phones.

**5d) Filtering and blocking systems. Should filtering systems be installed by default when the subscription allows internet access?**

We believe that filtering systems should be installed by default in mobiles that have an option of Internet access. Technical knowledge of Polish parents is not sufficient enough to install and activate a filtering tool on a mobile.

Besides, mobile operators should regularly update filtering software, informing the users about it.

**5e) Chat rooms. Should chat rooms accessible by children be moderated (in an automatic way or by a person)?**

*Nobody's Children Foundation* believes that the chat rooms should be moderated by a human, as such method is much more effective than technical moderation (or both could be used as complementary). Also, a kind of an intervention line could be set up by mobile operators, where children and young people could raise concerns about unpleasant situations associated with the use of a mobile.

**5f) Raising awareness among parents and children**

So far in Poland there hasn't been much discussion on the risks posed by the use of mobile phones by children. *Nobody's Children Foundation* recognises that in Poland much more awareness-raising work should be done in this area. So far no mobile operator has been active in educational activities among parents. Awareness-raising actions should be taken jointly by different actors, e.g. national awareness nodes working together with mobile operators.

**5g) Dedicated mobile phone packs for children, for which age group?**

We would welcome dedicated mobile phone packs for children under 10 years old. Such mobile phone packs should not offer Internet access, shouldn't have cameras intergrated and should have an option to allow phone calls only from a list created and approved by parents.

**European solutions**

**6) Among the measures listed above which ones would be useful to elaborate at European level? For which ones would it be useful to discuss/exchange best practices at European level?**