



## Deutsche Telekom Group

### Measures to Make the Internet a Better Place for Kids

Bonn, 21<sup>st</sup> January 2013

Inspired by the discussions within the 'CEO Coalition to make the internet a better place for kids' and the 'Principles for the Safer Use of Connected Devices and Online Services by Children and Young People in the EU' (ICT Coalition) on EU level, Deutsche Telekom Group commits to a set of measures that **further improve child online safety in its European Union markets.**

These measures strive to provide effective solutions to identified problems in the area of child online safety based on Deutsche Telekom Group's businesses. By taking these steps, Deutsche Telekom **builds on its engagement of the recent years and continuously takes on responsibility for own services and products** within the ICT sector. Deutsche Telekom's earlier international commitments to improve child safety are:

- European Framework for Safer Mobile Use by Younger Teenagers and Children<sup>1</sup>,
- Mobile Alliance against Child Sexual Abuse Content<sup>2</sup>,
- Teach Today<sup>3</sup>.

Various **additional commitments** have been undertaken by Deutsche Telekom Group's subsidiaries on national level too.

Each of the measures of this new commitment will be **implemented in the services and products of each of Deutsche Telekom's subsidiaries in the EU** within the next 12 months. The implementation will be undertaken in good faith to meet specific cultural preferences, different technologies and considering the companies' varying service and product portfolios as well as already established safeguards.

The measures will be **implemented individually by the following companies of Deutsche Telekom Group<sup>4</sup>:**

T-Mobile Austria GmbH, Austria

Globul (Cosmo Bulgaria Mobile EAD), Bulgaria

---

<sup>1</sup> [www.gsma.com/publicpolicy/wp-content/uploads/2012/03/Safer\\_Mobile\\_Flyer-1.pdf](http://www.gsma.com/publicpolicy/wp-content/uploads/2012/03/Safer_Mobile_Flyer-1.pdf)

<sup>2</sup> [www.gsma.com/publicpolicy/myouth/mobiles-contribution-to-child-protection/mobile-alliance](http://www.gsma.com/publicpolicy/myouth/mobiles-contribution-to-child-protection/mobile-alliance)

<sup>3</sup> [www.teachtoday.eu](http://www.teachtoday.eu)

<sup>4</sup> [www.telekom.com/wo](http://www.telekom.com/wo)

Hrvatski Telekom d.d., Croatia  
T-Mobile Czech Republic, a.s., Czech Republic  
Telekom Deutschland GmbH, Germany  
Cosmote (Cosmote Mobile Telecommunications S.A.), Greece  
OTE (Hellenic Telecommunications Organization S.A.), Greece  
Magyar Telekom Nyrt., Hungary  
T-Mobile Netherlands B.V., Netherlands  
PTC (Polska Telefonia Cyfrowa S.A.), Poland  
Cosmote (Romanian Mobile Telecommunications S.A.), Romania  
RTC (Romtelecom S.A.), Romania  
Slovak Telekom, a.s., Slovakia

### **Organisational measures**

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.

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.

### **Simple and robust reporting tools for users**

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.

- 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.
- 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.
- 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.
- 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.

### Age appropriate privacy settings

Deutsche Telekom is committed to improve age appropriate privacy settings through implementing the GSMA 'Privacy Design Guidelines for Mobile Application Development'<sup>5</sup>.

- The guidelines had been developed in the context of the GSMA Mobile Privacy Initiative<sup>6</sup> 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.

### Wider Use of Content Classification

Classification rules for digital content differ widely between the different EU Member States and, accordingly, Deutsche Telekom's subsidiaries 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.

### Wider Availability and use of parental controls

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

---

<sup>5</sup> [www.gsma.com/publicpolicy/privacy-design-guidelines-for-mobile-application-development](http://www.gsma.com/publicpolicy/privacy-design-guidelines-for-mobile-application-development)

<sup>6</sup> [www.gsma.com/publicpolicy/mobile-and-privacy/gsma-mobile-privacy-initiative](http://www.gsma.com/publicpolicy/mobile-and-privacy/gsma-mobile-privacy-initiative)

committed to provide customers with tools that allow parents to accommodate Internet usage to the needs of their children:

- 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.
- Additionally, Deutsche Telekom offers a **child safety price plan in mobile** communications, which allows customers to block internet access.
- For **fixed Internet access**, a service is offered allowing customers to filter inappropriate content from open Internet resources.
- On own digital content platforms **adult erotic content is only offered if age verification mechanisms** are applied to prevent access by minors.
- 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.

#### Effective takedown of child abuse material

The GSMA **Mobile Alliance against Child Sexual Abuse Content**<sup>7</sup> 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<sup>8</sup>. Deutsche Telekom commits to the following standards to ensure effective takedown of child abuse material:

- The corporate Child Online Safety Webpage **provides links to the INHOPE reporting app**<sup>9</sup>, which enables users to report child abuse material via their Smartphone.
- Corporate web pages provide the **link to the national INHOPE node or equivalent** for user reports on suspected child sexual abuse content online.
- Deutsche Telekom **supports the work of the INHOPE node** or equivalent in the respective country.

---

<sup>7</sup> [www.gsma.com/publicpolicy/myouth/mobiles-contribution-to-child-protection/mobile-alliance](http://www.gsma.com/publicpolicy/myouth/mobiles-contribution-to-child-protection/mobile-alliance)

<sup>8</sup> [www.gsma.com/publicpolicy/wp-content/uploads/2012/07/Mobilecontributiontonoticeandtakedown.pdf](http://www.gsma.com/publicpolicy/wp-content/uploads/2012/07/Mobilecontributiontonoticeandtakedown.pdf)

<sup>9</sup> [www.inhope.org/gns/about-us/INHOPE\\_mobile.aspx](http://www.inhope.org/gns/about-us/INHOPE_mobile.aspx)

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