



Vodafone Group Statement of Commitments to CEO Coalition to 'Make the Internet a Better Place for Children', January 2013

Following an invitation from Vice-President Kroes of the European Commission, Vodafone Group signed up in December 2011 to join the CEO Coalition to 'Make the Internet a Better Place for Children'. Following the Statement of Purpose, we have, together with the other 30 signatories, worked towards concrete measures on 5 Actions in 2011-2012.

In the last 12 months, the CEO Coalition has worked on 5 Actions and has extensively discussed and analysed the areas of action. In the course of this extensive work, and with consultation of civil society, Coalition members have delivered concrete outcomes and identified sets of good practices which serve as recommendations to the ICT Industry. Based on these recommendations, Vodafone Group commits to/declares the following concrete steps:

Introduction

Vodafone Group has been addressing child protection online since 2002 and established a Group Vodafone Content Standards team to focus on this area. This corresponded with innovation of delivering internet access and commercial content through 3G networks.

Vodafone was the first company in the world to deliver an online child protection filter across its 3G mobile network in 2004 in the UK, which included integration of the Internet Watch Foundation (IWF) Child Abuse Material Block list. Subsequently, other Vodafone operating companies across Europe have adopted a similar approach.'

Delivering commercial content from the Vodafone portal 'Vodafone live!', such as Games, Music, Film, Chat & IM services and access to adult content, involved a number of company initiatives in the area of child protection. These included developing robust internal policies that were benchmarked against established public and regulatory standards, developing a framework for classification of content, and implementing network parental controls across our markets.

The launch of the Vodafone Guardian app in late 2011 is an example of the need to innovate in this area to address new online risks - simply protecting children from unsuitable adult content is no longer the main imperative; issues such as bullying and irresponsible behaviour also need to be addressed. Vodafone believes that technical solutions and education should go hand-in-hand when it comes to online child protection. Developing education initiatives to empower parents and teaching professionals has therefore been central to our approach. For example, the Vodafone Digital Parenting magazine and website - <http://www.vodafone.com/parents> - advise parents how to help their children to use technology safely and responsibly.

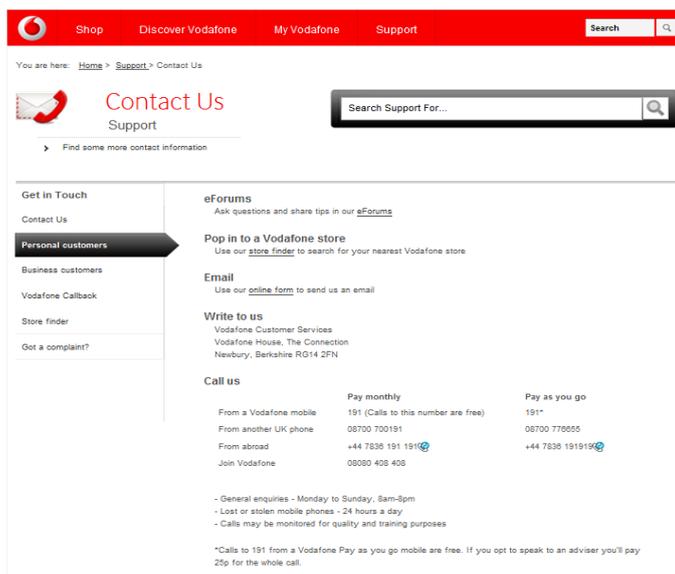
As mobile internet access and devices have advanced, the value chain has diversified. Vodafone welcomes the fact that companies such as Wi-Fi network providers, handset manufacturers and content providers are also taking action to protect children online. Vodafone supports the CEO Coalition in its engagement of a number of leading companies and platforms to address the action points identified.



Vodafone is a leader in the online protection field and, whilst many of the actions specified by the CEO Coalition will have limited implementation actions for Vodafone due to our advanced position, we will continue to remain committed to invest and innovate in this area.

Action 1 Simple and robust reporting tools for users

- Vodafone Operating Companies have comprehensive Customer Service contact points in our retail outlets, by telephone to our contact centres and via online support, to manage all customer issues and reports. Please see Vodafone UK example below (<http://help.vodafone.co.uk>)



The screenshot shows the Vodafone UK support page. At the top, there is a navigation bar with 'Shop', 'Discover Vodafone', 'My Vodafone', and 'Support'. A search bar is located on the right. Below the navigation bar, the page title is 'Contact Us Support'. There is a search bar for support topics. The main content area is divided into several sections: 'Get in Touch' (Contact Us, Personal customers, Business customers, Vodafone Callback, Store finder, Get a complaint?), 'eForums' (Ask questions and share tips in our eForums), 'Pop in to a Vodafone store' (Use our store finder to search for your nearest Vodafone store), 'Email' (Use our online form to send us an email), 'Write to us' (Vodafone Customer Services, Vodafone House, The Connection, Newbury, Berkshire RG14 2FN), and 'Call us' (Pay monthly, Pay as you go, From a Vodafone mobile, From another UK phone, From abroad, Join Vodafone). There are also some general enquiries and contact information at the bottom.

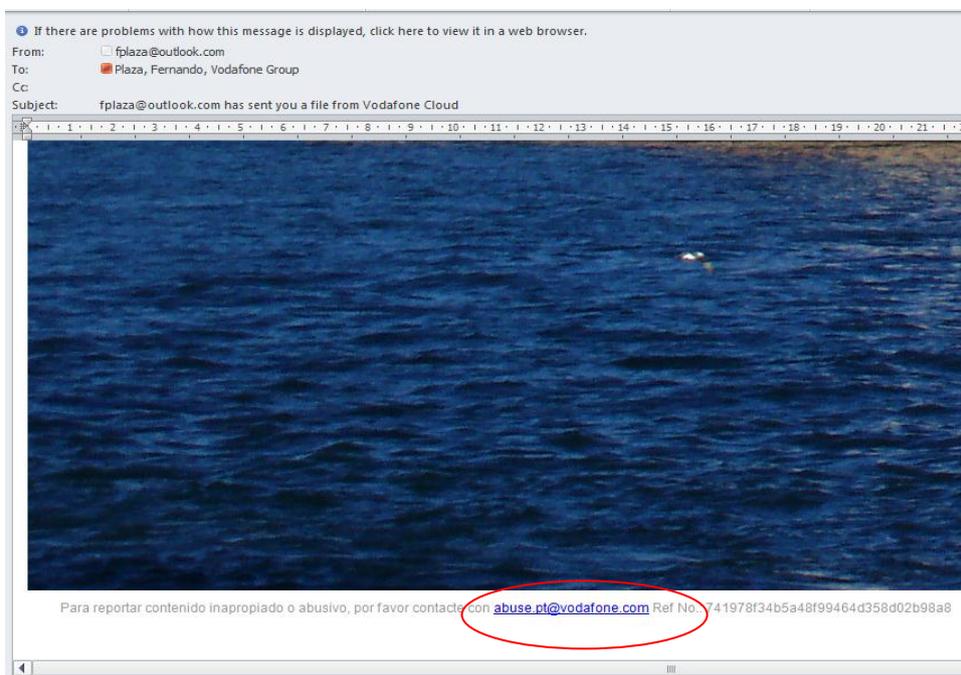
- Vodafone's approach to customer contact is to keep everything simple and to be proactive in resolving any issues that arise. For example Vodafone Germany has established a free of charge contact point by telephone for Child Protection issues <https://www.vodafone.de/unternehmen/soziale-verantwortung/jugendschutz.html>



The screenshot shows the Vodafone Germany child protection page. The navigation bar includes 'Unternehmen', 'Prozessservice', 'Jobs & Karriere', 'Engagement', and 'Innovation'. The main content area is titled 'Jugendschutz' and features a large image of children. Below the image, there is a section titled 'Schutz von Kindern und Jugendlichen' with a sub-heading 'Medienkompetenz'. The page is divided into three columns: 'Medienkompetenz', 'Jugendschutzprodukte', and 'Schutzsysteme'. The 'Medienkompetenz' column includes a section 'Schau HR - Was Deine Kinder machen?' and a section 'Kinder wachsen heute mit einer Fülle von Medien auf und entdecken früh das Interesse für Fernsehen, Internet, Handy und...'. The 'Jugendschutzprodukte' column includes a section 'Vodafone unterstützt Eltern dabei, ihren Kindern die sichere Nutzung von Smartphones zu ermöglichen. Mit der Vodafone Child Protect...'. The 'Schutzsysteme' column includes a section 'Jugendschutz.PRI bei Vodafone TV und Vodafone Net' and a section 'Erwachsenenhalte bei Vodafone Net und Vodafone TV sind durch ein statisch...'. There is also a 'Hotline' section on the right side of the page.



Vodafone provides clear instructions for reporting abuse on Vodafone Cloud, its storage and sharing service. (See Vodafone Portugal abuse reporting option on notification email below)



The Vodafone Digital Parenting magazine (<http://www.vodafone.com/parents>) includes a summary of the reporting processes of many of the third party online services our customers use (see image below) and a separate in-depth guide to reporting content to the IWF.

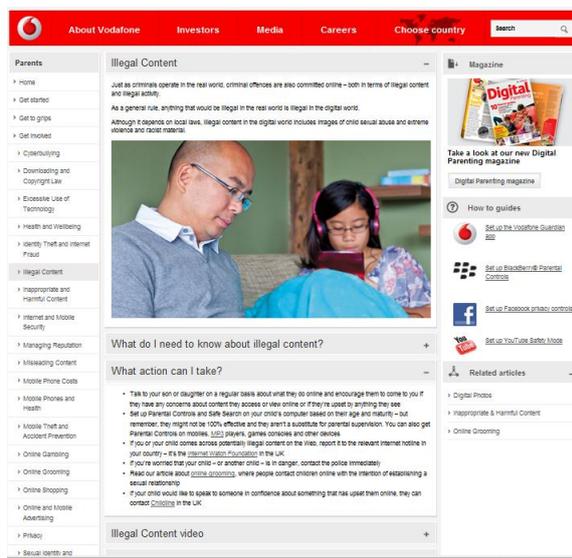




- Vodafone Spain (<http://www.vodafone.es/padres>) has supported the Proteleges reporting button (see screen shot below).



- Vodafone provides information on reporting Child Abuse Material on its websites, including http://www.vodafone.com/content/index/parents/get_involved/illegal_content.html (see screen shot below).



Vodafone Group will in 2013 continue to work with industry, helplines and hotlines to improve the reporting processes for inappropriate content and contact.



Action 2 Age appropriate privacy settings

- Vodafone Group has already signed up to the GSMA Privacy Design Guidelines for Mobile Application Development, published in February 2012 (<http://www.gsma.com/publicpolicy/mobile-and-privacy/design-guidelines>) The guidelines include specific requirements concerning the collection, access and use of personal information where applications are directed at or used by children and adolescents.
- Vodafone won the 10th annual HP-IAPP Privacy Innovation Award in 2012 (http://www.vodafone.com/content/index/about/about_us/privacy/privacy_award.html). The Vodafone Privacy Programme is founded on global principles – the Vodafone Privacy Commitments - and supported by a comprehensive governance and risk management framework. The programme trains professionals who engage with the business to look for positive solutions rather than regulatory tick-box compliance. Privacy isn't seen as a legal roadblock; instead, potential privacy risks are identified, owned and managed by business units as a way to enhance the customer experience.
- The Vodafone Digital Parenting magazine (<http://www.vodafone.com/parents>) includes an in-depth article on privacy (page 50), emphasising the need to educate parents on this issue. We also worked with Facebook to develop a 'How To Guide' about setting up Facebook privacy controls (see image below).



- Vodafone Group will in 2013 implement the GSMA app privacy guidelines when producing apps for customers and also look to increase customer awareness of privacy settings.
- Vodafone Group will in 2013 promote the CEO Coalition database for age appropriate privacy settings to customers via the Vodafone Digital Parenting website (<http://www.vodafone.com/parents>)



Action 3 Wider use of content classification

- Vodafone Group has had a content classification policy in place since 2004 requiring content available on Vodafone's portals to be classified and placed behind parental controls where necessary (see Action Group 4).
- The Vodafone Digital Parenting magazine (<http://www.vodafone.com/parents>) provides information for parents about the importance of content classification (page 22 - see image below).



Vodafone Group will in 2013 continue to consider, test and, where appropriate, implement technical innovations in the classification of non-Vodafone websites and/or content.

Action 4 Wider availability and use of parental controls

- Vodafone Group implemented parental controls across all its markets in 2007, provided free to customers, including optional network filtering in the following EU markets: UK, Ireland, Spain, Germany, Malta, Portugal, Italy, Romania, Hungary, Greece and Czech Republic.
- Vodafone Group launched the Vodafone Guardian app in 2011 after an initial pilot launch by Vodafone Ireland in 2010. The app enables parents to manage the usage, content, contacts and capability of their child's Android device. By the end of 2012, the app had been downloaded by 420,000 customers in 16 markets including the UK, Ireland, Germany, Italy Spain, Portugal, Netherlands, Greece, Czech Republic, Romania, Malta and Hungary.



The Vodafone Digital Parenting magazine and website (<http://www.vodafone.com/parents>) include a number of “How To” guides about how to set up parental controls on Vodafone and other leading internet services and hardware, including BlackBerry and Xbox 360 (see image below).

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How to... activate Vodafone Content Control on your child's mobile

Vodafone provides tools to help prevent access to age-sensitive content and services, such as those rated 18, which are particular to local laws or codes of conduct in individual countries. Below is an example based on Vodafone UK's parental content control solution.

Vodafone UK was the first mobile network operator to launch Web Filtering Parental Controls—called Content Control—in 2005.

Parents should always check which controls are in place when purchasing a mobile handset for their child.

With Vodafone Content Control activated, the user receives a splash screen if a website they try to access is classified as 18 and above.

To change the Content Control, users must be over the age of 18, have the approval of the Vodafone account holder (if they are not the registered user) and, if necessary, provide proof of age.

If the user has a Vodafone online account, they can check if Content Control is activated even if they do not have the phone to hand. In the future, we show you how a Vodafone account holder can check the Content Control setting in this way.

Step 1
Getting a Vodafone online account
If you have a Vodafone mobile, you can set up an online account at www.vodafone.co.uk and click on Log In to My Account, which will prompt you with the option to Register for My Account.

During registration you will need the mobile phone to verify you will receive a security passcode to complete the registration. Bring the SIM and number to their account.

It will also help if you have an existing email account to prompt for a stronger password etc.

Step 2
Checking My Settings
Once you have an online account, you can manage all the details of your Vodafone account including your tariff plan, mobile, text or internet call barring and Content Control.

You'll find the Content Control settings under the 'My Settings' section.

Click here to see the current setting on your child's mobile phone.

Step 3
Content Control setting
If the Content Control setting is off, you can choose for it to be activated.

The setting will change the next time the handset/SIM is used to access the internet.

As with PCA, you might need to check some details of access and also clear the history cache.

Step 4
Confirmation
Any changes made to the settings will appear on a confirmation screen and be sent to your email address.

If you are the account holder but you do not have access to an online account, you can also check the settings via Customer Care (191) from a Vodafone phone or a Vodafone Shop.

Your local mobile retailer (outside of the UK) should refer to your local Vodafone website or contact Customer Care.

If you're in the UK, visit the Support section at www.vodafone.co.uk

Thank you
We've made your changes up to 12 hours. Here's who to call settings

vodafone
www.vodafone.co.uk

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How to... set up the Vodafone Guardian app

The Vodafone Guardian app helps to keep children safer when using a smartphone.

As part of Vodafone's commitment to supporting parents in encouraging their children's safe and responsible use of digital technology, it offers the free Vodafone Guardian app for use on a range of Android devices.

Vodafone Guardian helps parents to manage their child's smartphone by providing protection from inappropriate calls, messages and online content.

The app enables parents to stay in control in a number of ways, including:

- Blocking specific contacts or mobile phone numbers to prevent bullying text messages or calls
- Specifying times during which their child can make or receive calls, use apps, access the Web and use the camera
- Restricting outgoing calls to named contacts, such as Mum, Dad or specific friends
- Transferring bullying text messages to a secure folder on the phone that could be used as evidence with the child's school or the police

Vodafone Guardian is available to download for free from the Vodafone AppDirect store and Google Play.

Step 1
Set a Parent Contact
Once you have downloaded the app, enter a parent contact number so that you receive a text whenever Vodafone Guardian is obstructed for any reason. Click 'Next'.

You will also receive a text when an emergency call is made from the handset. Calls to Childline and police are always allowed, you are not notified, and Vodafone Guardian removes the log entries for such calls.

Step 2
Choose a password
You can set a password so that you control the app. No changes can be made to the Vodafone Guardian settings without this password. Simply enter your password twice and click 'Next'.

Step 3
Enable Message Helper
If you enable Message Helper, Vodafone Guardian will show a 'Do Not Accept' button next to incoming messages. Pressing that button will make the message vanish from your child's inbox and delete it from their also calls and texts (where possible) if they get an unwanted message.

On the Message Helper and choose 'Message enabled', 'Never enabled' or 'Enabled between' and enter your chosen hours and days.

Step 4
Customise the settings
You can customise the settings for calls, text messages and phone features, such as Vodafone Guardian, Camera, Browser and History and Download Apps.

For example:

- If you want to set a time or location when your child can receive or make calls or receive texts, click on Calls & Messages, then 'Active hours' and choose the time limits. Press 'Apply' for setting how your child uses their mobile during school hours or after bedtime, for example.
- If you decide that you prefer your son or daughter to not have access to the internet on all but their mobile, go to 'Phone Features' then 'Browser' and choose 'Never allowed'.
- To prevent use of the camera when they're at school, go to 'Phone Features' then 'Camera' and set the timer under 'Auto' 'Blocked between'.

Vodafone Guardian has been developed by the Vodafone Foundation (registered charity No. 1086022) as part of its Mobile for Good programme.

vodafone
www.vodafone.co.uk

Vodafone Group will in 2013 continue to develop the Vodafone Guardian App based on customer feedback and technological advancements as well as continue to raise awareness of tools available, including pre-loading of the Vodafone Guardian App onto Android devices.



Action 5 Effective takedown of child abuse material

- Vodafone Group is a member of the IWF and has a licence to use the IWF Block list in territories outside of the UK.
- Vodafone Group has been a member of the Mobile Alliance Against Child Sexual Abuse Content since 2008 (<http://www.gsma.com/publicpolicy/myouth/mobiles-contribution-to-child-protection/mobile-alliance>). The Mobile Alliance was founded by an international group of mobile operators within the GSMA to work collectively on obstructing the use of the mobile environment by individuals or organisations wishing to consume or profit from child sexual abuse content.

The Alliance's aim is to help stem, and ultimately reverse, the growth of online child sexual abuse content around the world. Through a combination of technical measures, co-operation and information sharing, the Alliance seeks to create significant barriers to the misuse of mobile networks and services for hosting, accessing, or profiting from child sexual abuse content.

- Vodafone Group places a requirement on all of their subcontracted suppliers and internally hosted services to implement Vodafone's comprehensive N&TD process which manages the escalation and takedown of Child Abuse Material reported by our customers, hotlines and law enforcement agencies.
- The Vodafone Digital Parenting magazine and website (<http://www.vodafone.com/parents>) includes information about taking action against Child Abuse Material - we worked with the IWF to produce the first standalone guide to reporting content to the IWF (see image below).

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How to...
report online child sexual abuse content to the IWF

The Internet Watch Foundation (IWF) provides the UK Hotline for the public and IT professionals to report potentially criminal online content in a secure and confidential way. You can anonymously report:

- Child sexual abuse images and videos hosted anywhere in the world
- Criminally obscene adult content hosted in the UK. This is adult pornography of an extreme and criminal nature, such as rape or torture
- Non-photographic child sexual abuse images hosted in the UK, such as computer-generated or hand-drawn images of children being sexually abused

The IWF works closely with the online industry to ensure that child sexual abuse images and videos are removed from the internet quickly and that access to these websites is prevented while the take-down is in progress.

At the same time, the IWF keeps close relationships with law enforcement agencies to ensure that the necessary evidence is preserved so that law enforcement can investigate the people who produce and distribute the content.

To report criminal content, go to www.iwf.org.uk and click on the report criminal content here button. This will take you through the reporting process which only takes a couple of minutes.

Step 1
Indicate the type of content
The IWF specifically deals with child sexual abuse content hosted anywhere in the world and criminally obscene adult content and non-photographic child sexual abuse images hosted in the UK. You are asked to indicate which of these three types of content you think you are reporting.

Step 2
Indicate where you found the content
Simply tick the box indicating where you found the content (websites, open/public, emails, etc.).

Step 3
Provide the URL
Provide the full URL of the website where you have encountered the content. You can also have additional comments about you wish.

Step 4
Choose reporting method
You can choose whether to report anonymously or to leave your contact details. If you require feedback, the IWF will keep you informed about the progress of the assessment and the possible removal of the content.

Step 5
Report confirmation
You will receive a message indicating your report has been submitted to the IWF.

In 2011, the IWF processed a total of 41,877 reports and was able to take action on 10,900 URLs as they were considered to contain potentially criminal child sexual abuse content.

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www.iwf.org.uk

- Vodafone Group will in 2013 provide support to any INHOPE and LEA/NGO hotlines initiatives that look to improve effective takedown times of Child Abuse Material.