

"A Safer Internet for Minors"

Alliance to Better Protect Minors Online

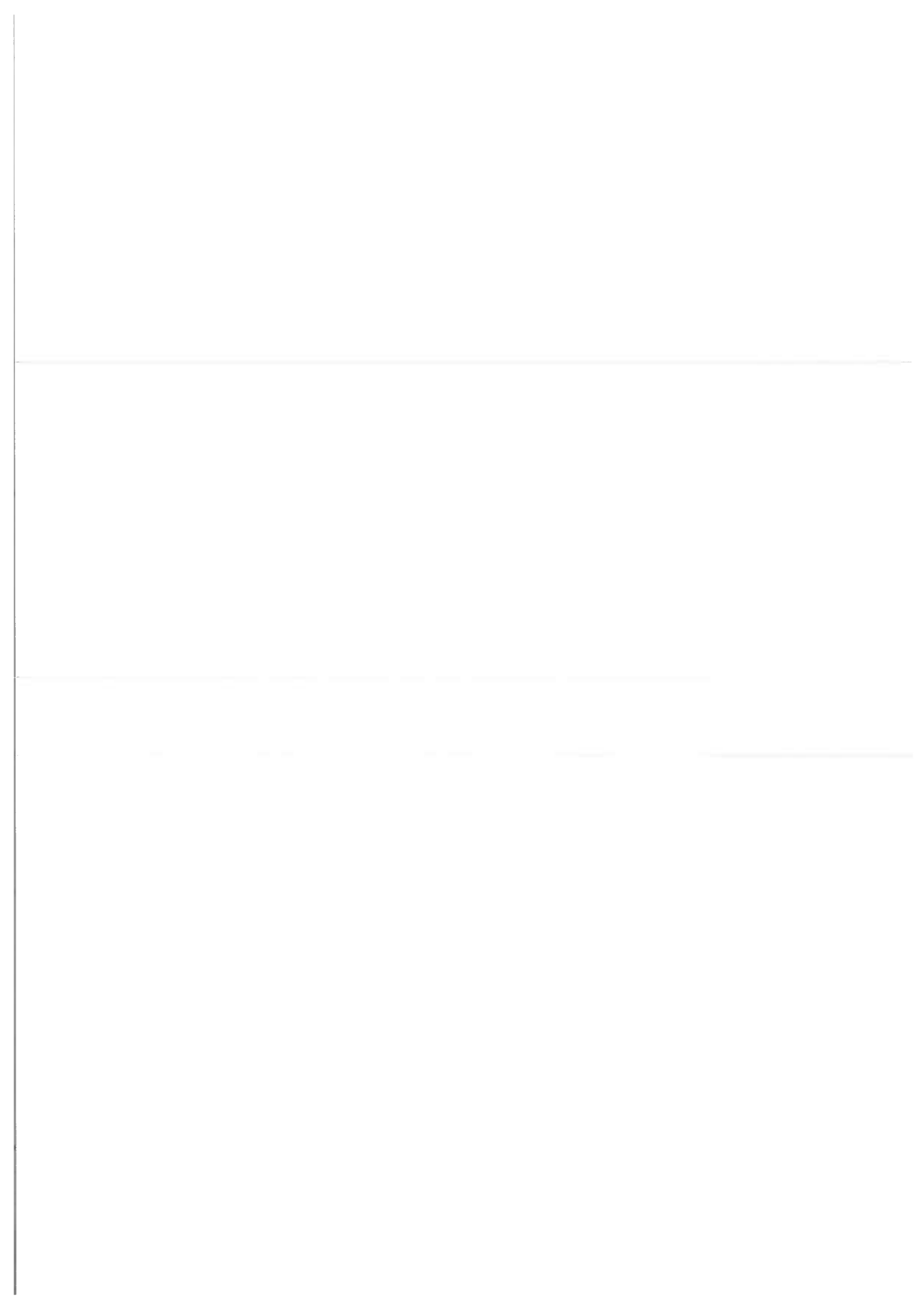
Individual company statement

Template

Members of the Alliance agreed to submit a list of specific commitments and timeline for implementation to the European Commission within three months of endorsing the Alliance Statement of Purpose (7th February 2017). This template is intended to help formulate your actions and transmit them to the European Commission in a harmonised format.

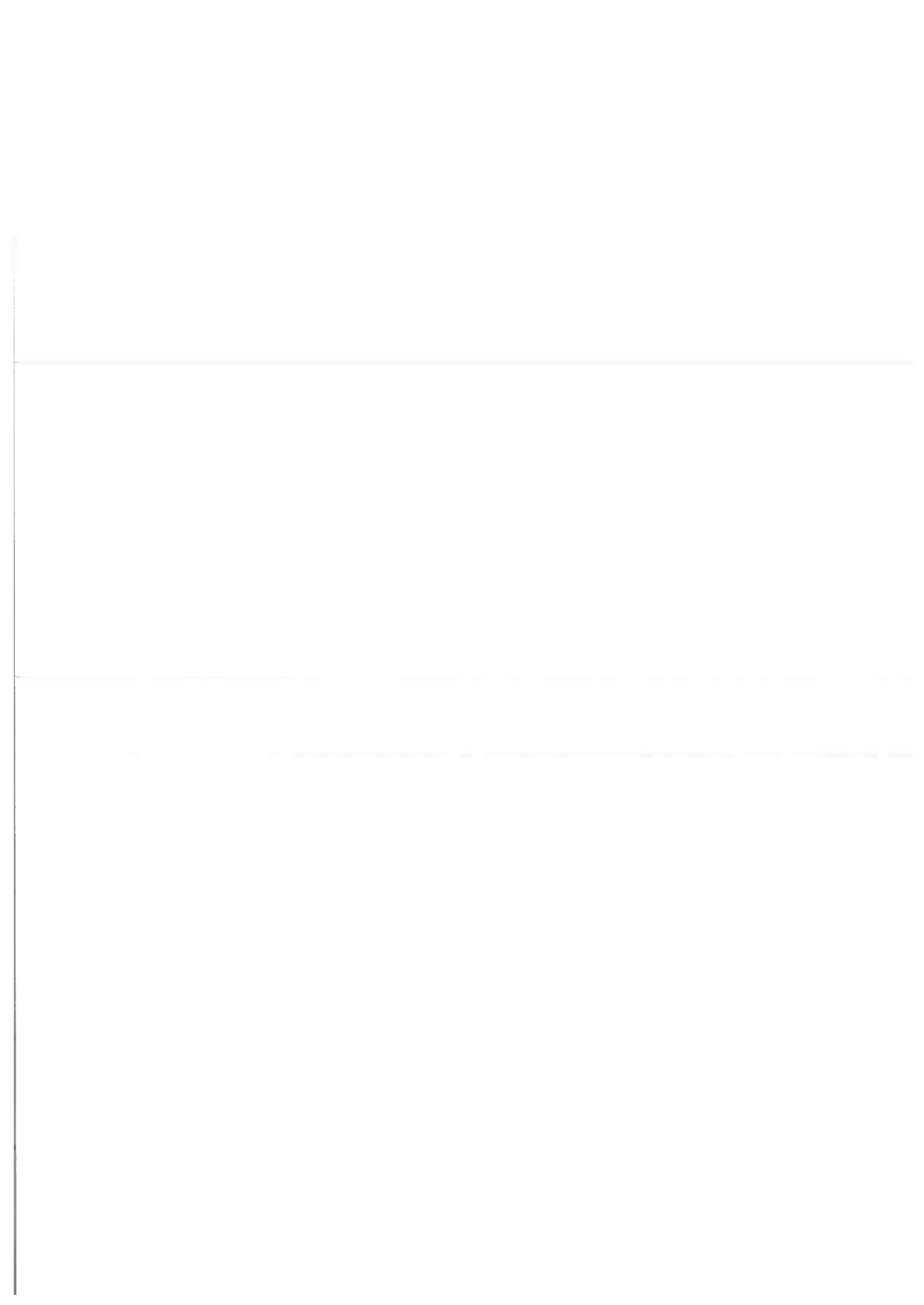
THE COMPANY INFORMATION

Name of the company:
Vodafone Group Services Limited Registered Office: Vodafone House, The Connection, Newbury, Berkshire RG14 2FN Registered in England number 3802001
Please provide a brief description of services/products your company offers to minors.
Vodafone provides Fixed and Mobile access to the internet as well as voice communications and Cable and IPTV content services. "Post-Pay" contract services require the contract owner to be 18 years of age and above however, some parents provide mobile phones to younger children using these contracts or with pre-pay services. We offer "Family" tariffs for mobile access and also our Cable and IPTV services will offer channels containing content for children.
Countries where products/services targeting (used by) minors are offered by your company.
In Europe Vodafone provides a number or all of the services outlined above in the following Member States - Czech Republic, Germany, Greece, Hungary, Ireland, Italy, Malta, Netherlands (Joint Venture Vodafone Ziggo), Portugal, Romania, Spain and UK.



SECTION 1. USER-EMPOWERMENT

1. Identifying and promoting best practice for the communication of data privacy practices.		
Measures		Timeline for future actions
Current	Future	
<p>Vodafone has a "Privacy by Design" policy when developing products and services. Although there are no current services for under 16s the policy requires default privacy settings for younger users. For further details please refer to ICT Coalition Implementation report Principle 5 – Privacy and Control [link to be inserted] or at: http://www.vodafone.com/content/index/about/privacy.html or download: https://www.vodafone.com/content/dam/group/policy/downloads/vodafone-privacy-programme.pdf</p> <p>Vodafone also provides general support on other internet service's privacy settings. See- http://www.vodafone.com/content/digital-parenting/tools.html</p>	<p>Vodafone's strategy for supporting young people when online is by general awareness raising (See Section 3 Awareness Raising for full details), helping to enable them get the most positive experience out of the opportunity that the Internet provides. As part of Vodafone's BeStrong Online Digital Resilience initiative, discussion topics within a number of the modules e.g. "Digital Footprint" and "Selfies and Self Esteem" cover the issues of privacy and what choices can be made to protect it.</p>	<p>Roll-out across EU markets 2017 - 2019</p>

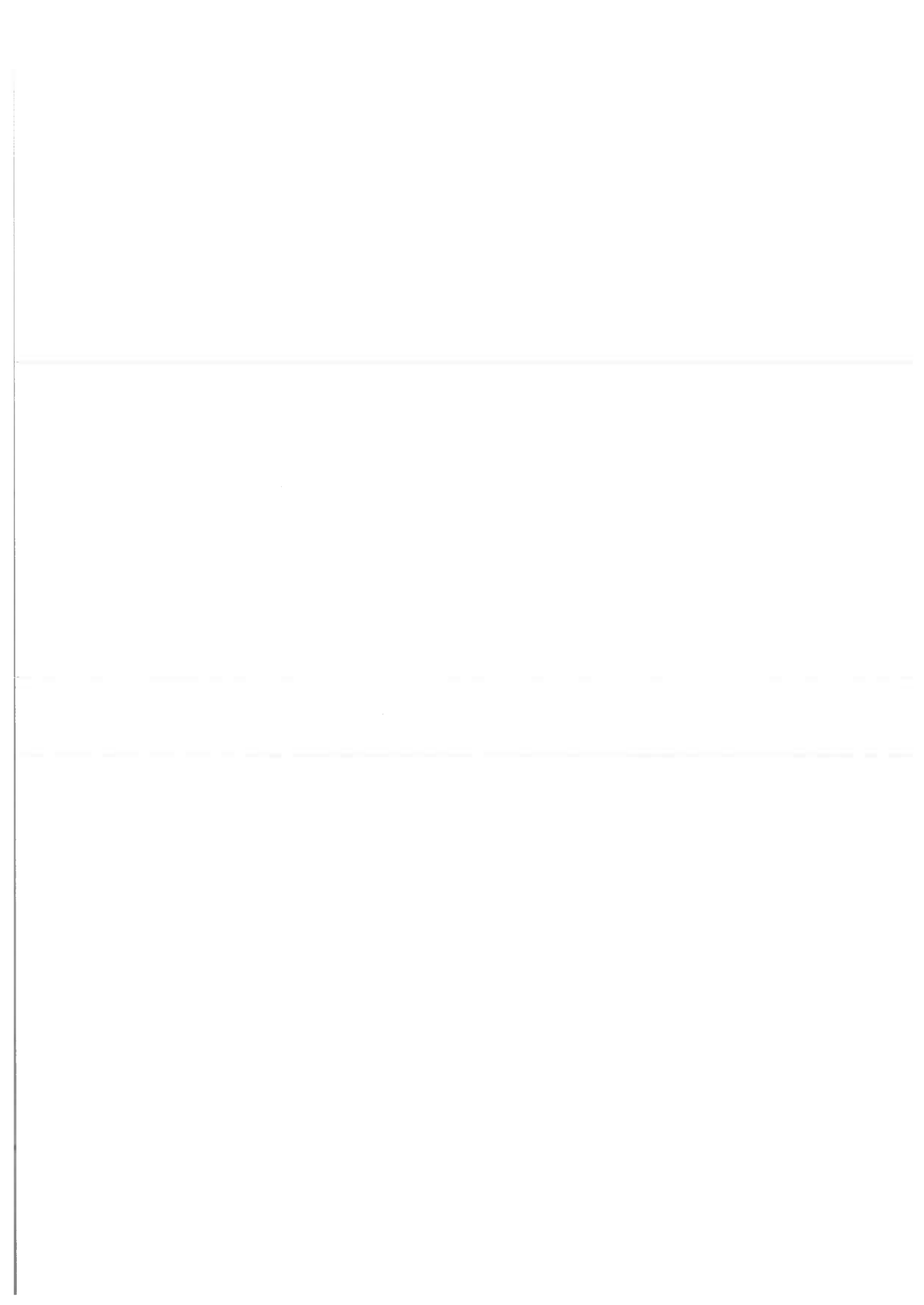


2. Providing accessible and robust tools that are easy to use and to provide feedback and notification as appropriate.

Measures		Timeline for future actions
Current	Future	
Vodafone does not offer any services that require specific reporting or feedback tools but does have comprehensive customer service contact points via our retail outlets, contact centres, online forums and MyVodafone App which is free to use for reporting any customer issues. Vodafone's processes for handling abuse or misuse are predominately concerning P2P malicious calls or texts and our tools (See 5 below) allow the blocking of abusive callers.	N/A	N/A

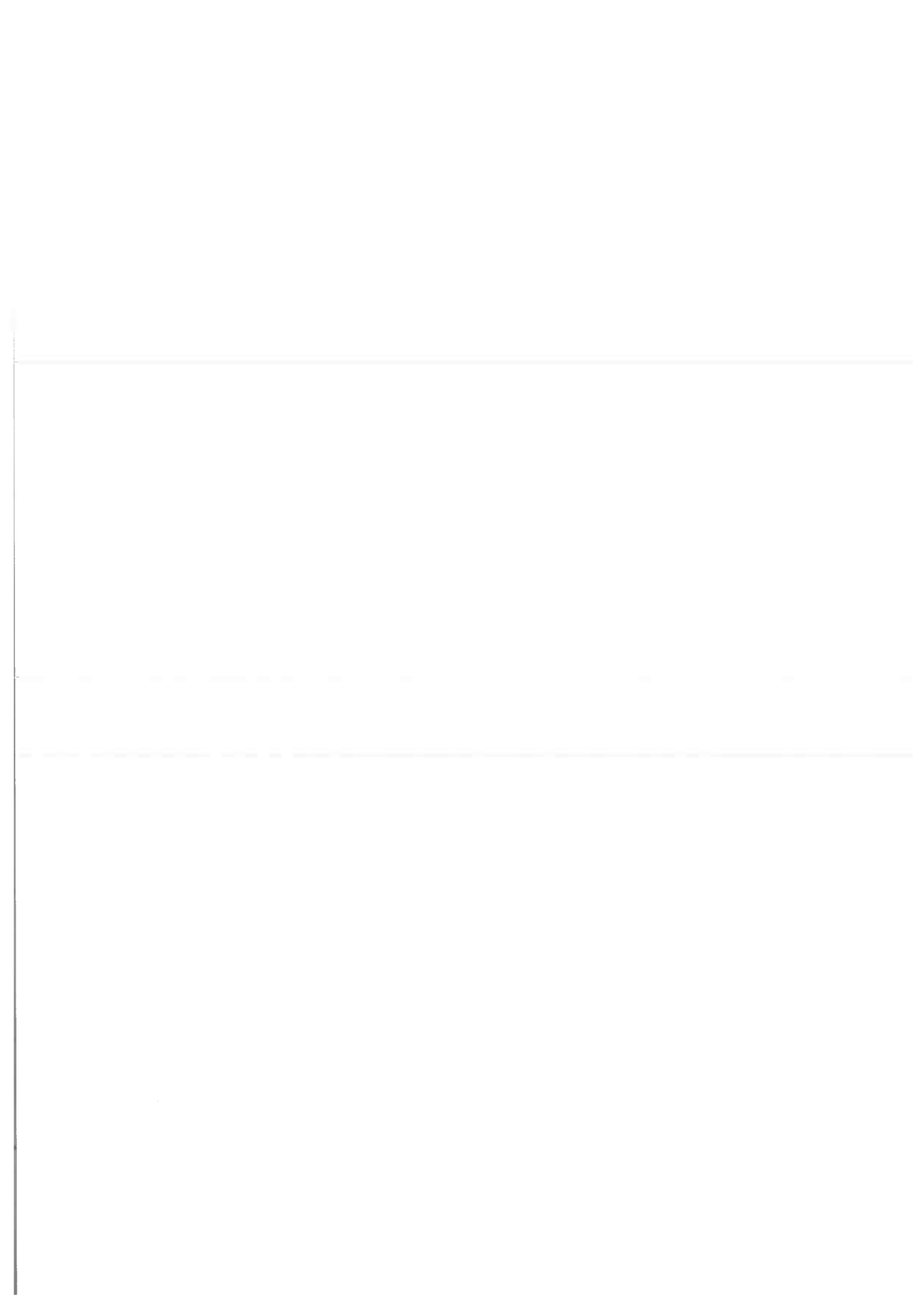
3. Promoting users' awareness and use of information and tools to help keep themselves safer online and of their responsibility and duty to behave responsibly and respectfully towards others and foster trust, at the same time promoting minor's digital empowerment.

Measures		Timeline for future actions
Current	Future	
Vodafone's tools are described in the items below, covering content classification and parental tools. Information is covered in Section 3, Awareness Raising. Concerning conduct, Peer to Peer is seen as a powerful way of communicating messages to teenagers and with this in mind Vodafone created a suite of #BeStrong 'support emojis' to help young people convey compassion and support to friends who are being bullied online, focussing on awareness and engagement. The intention was to encourage young people to support each other - as peer to peer support has been proven to be the most successful intervention in a bullying situation- see https://www.gov.uk/government/publications/children-and-young-peoples-mental-health-peer-support	Please refer to section 3: Awareness Raising	



<p>The final portfolio of emojis https://www.flickr.com/photos/vodafonegroup/sets/72157658628177755/ were chosen by 5000 teens that took part in a survey, there has been a 153.5million reach across social and online media and 865,349 views of YouTubers' videos about the emojis – See https://www.youtube.com/watch?v=p8Ju-UUJ99s. The emojis have a creative commons licence and can be used by anyone under those conditions.</p>		
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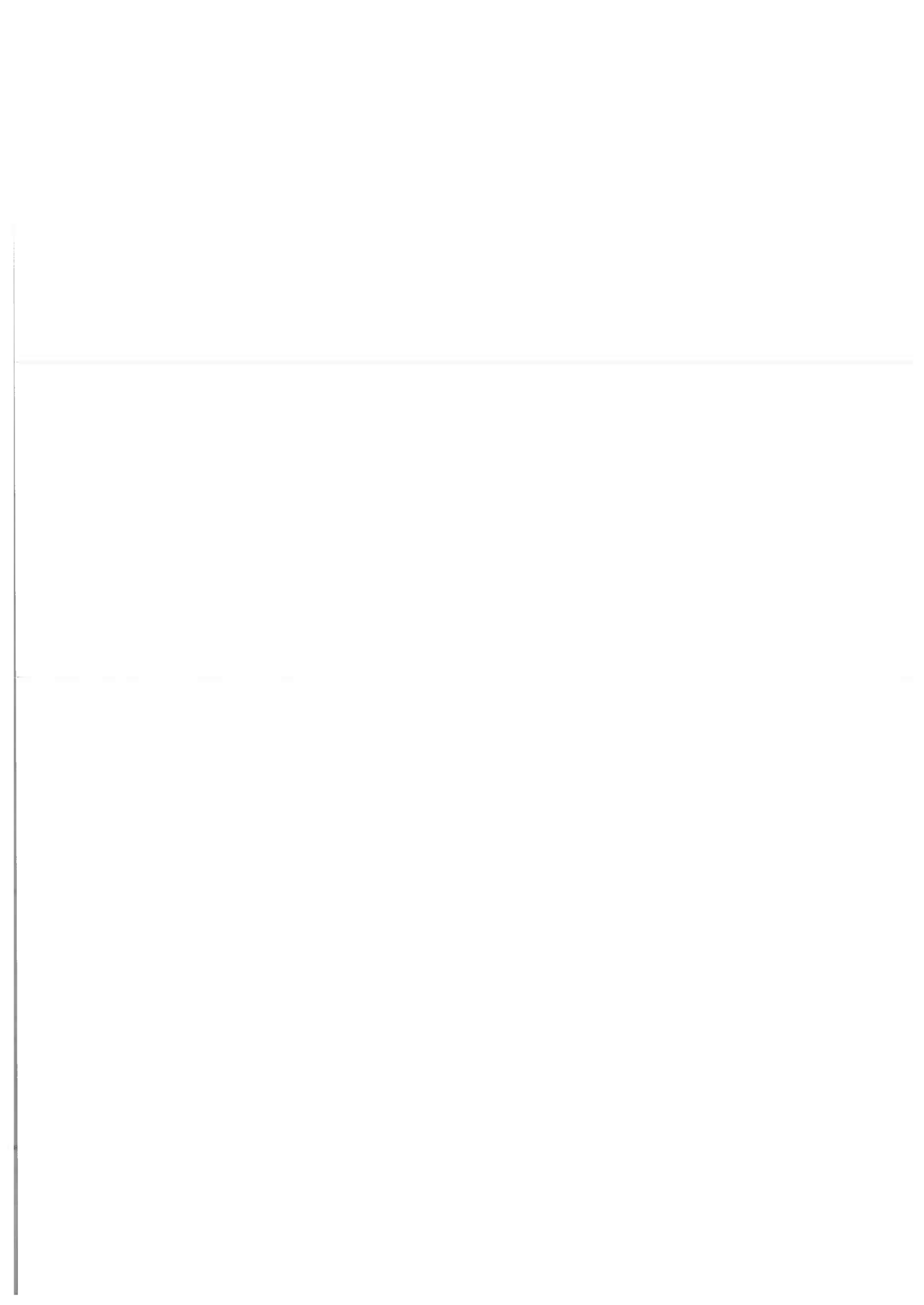
4. Promoting the use of content classification when and where appropriate.		
Measures		Timeline for future actions
Current	Future	
<p>All Vodafone's Cable and IPTV services age-classification and age-verification systems meet national requirements. For further details please refer to ICT Coalition Implementation report Principle 1 – Content http://ictcoalition.eu/commitments</p>	<p>[Business As Usual – to meet any new requirements of AVMS Directive]</p>	<p>N/A</p>



5. Promoting the awareness and use of parental control tools.		
Measures		Timeline for future actions
Current	Future	
Vodafone's policy has been to provide network-based parental controls on its mobile networks where legal to do so. An alternative client-based option had been provided in other markets. In some markets the controls were set on as a default, in others their availability is marketed on the company's website. For fixed, local solutions are offered where appropriate. For further details please refer to ICT Coalition Implementation report Principle 2 – Parental Controls http://www.ictcoalition.eu/commitments	Continued development of Vodafone's Securenet https://securenet.vodafone.com/ across EU markets and awareness-raising of third party client-based solutions as an alternative. Increased awareness raising by development of Parent Module to be used in schools/NGOs to develop understanding of issues and how to support their children.	Securenet 2018-2022, Parent Module 2017-2018

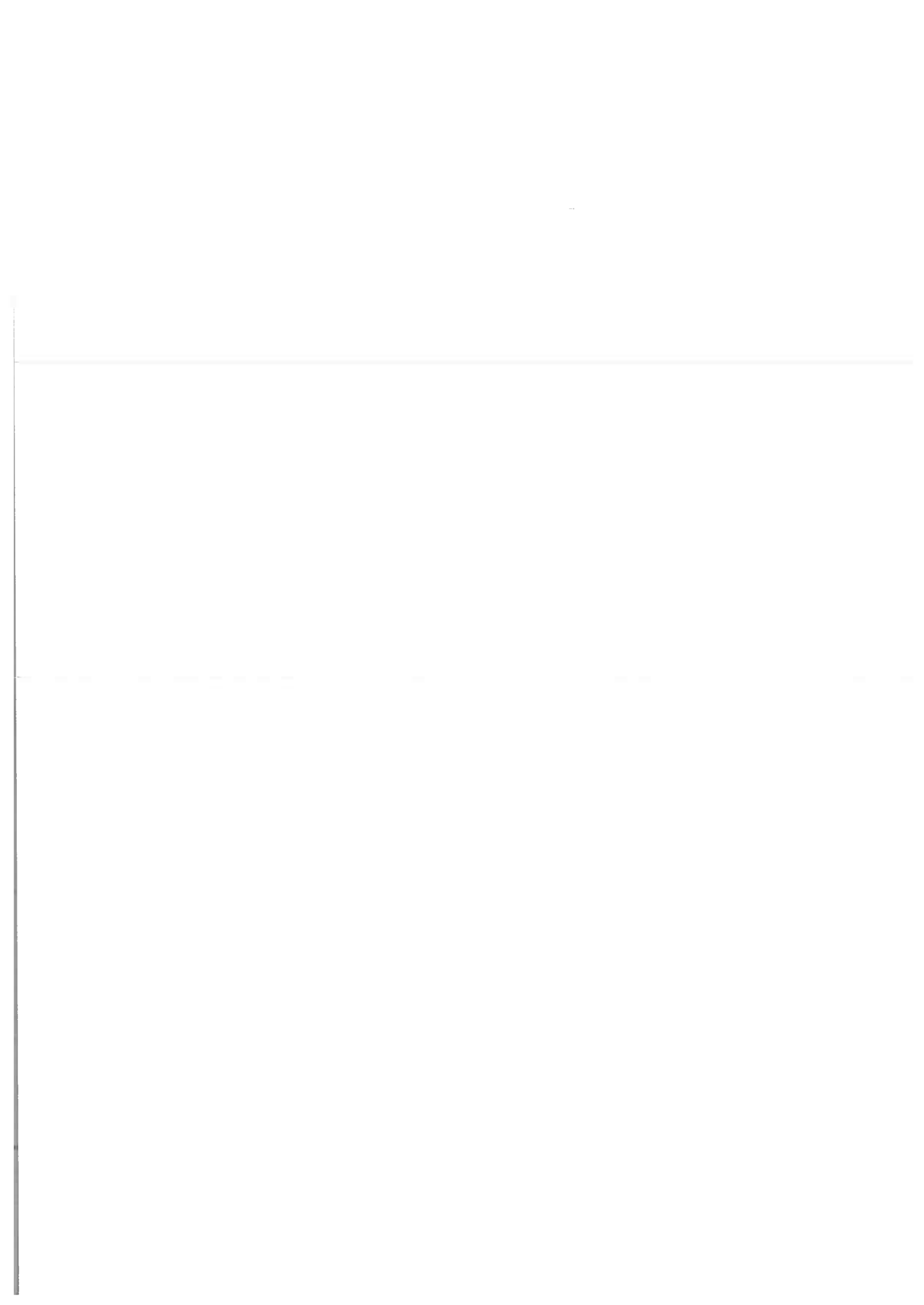
SECTION 2. ENHANCED COLLABORATION

6. Intensifying cooperation between ourselves and with other parties such as Child Safety Organisations Governments, education services and law enforcement to enhance best practice-sharing.		
Measures		Timeline for future actions
Current	Future	
Vodafone is proactive in the engagement of and collaboration with multi-stakeholders across all of our markets. In the EU we have been at the spearhead of self-regulatory initiatives such as the GSMA European Framework for Safer Mobile Use by Younger Teenagers and Children 2007, Teachtoday in 2008, the ICT Coalition 2011, the CEO Coalition 2011 and ENABLE in 2015 http://enable.eun.org/ . From 2014 to 2017 Vodafone chaired the IWF Funding Council and also chaired the Family Online Safety Institute. At a Member State level Vodafone works with the appropriate NGOs and civil society to deliver best practice sharing. Please see ICT Coalition Implementation Report Principle 4- Child	Business as Usual – Vodafone will continue to sit on the ICT Coalition's Steering Group and deliver twice a year Forums and the commissioning of independent reports http://ictcoalition.eu/news-events as well as working at a national level with local NGOs and LEA to share best practice. http://ictcoalition.eu/commitments	Ongoing



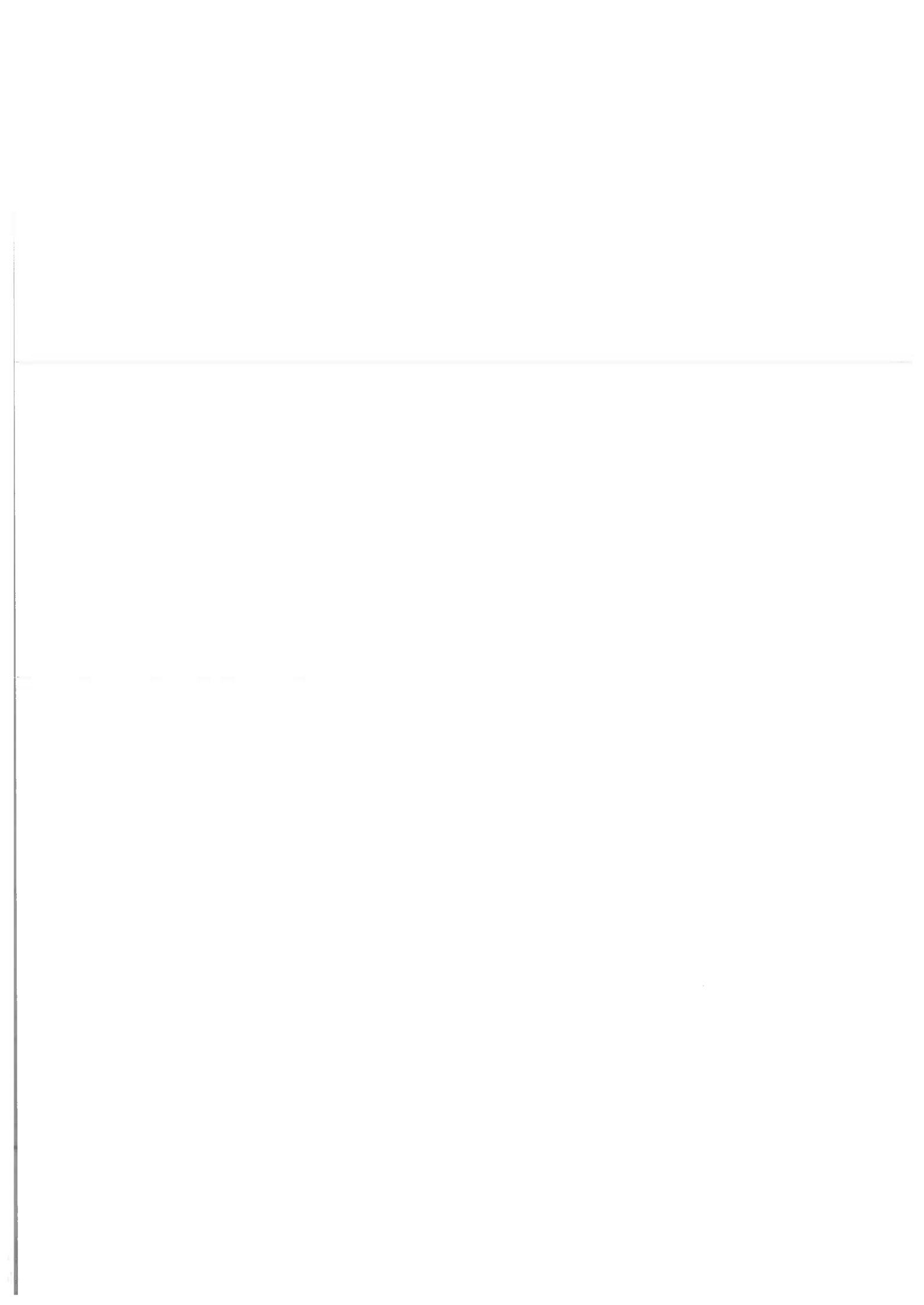
<p>Sexual Abuse content or illegal content and Principle 6 Education and awareness for specific local collaboration with NGOs and law enforcement</p> <p>http://ictcoalition.eu/commitments. Please also refer to Vodafone's Law Enforcement Disclosure report:</p> <p>https://www.vodafone.com/content/sustainabilityreport/2014/index/operating_responsibly/privacy_and_security/law_enforcement.html</p>		
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<p>7. Identifying emerging developments in technology such as connected devices and with the support of the Commission, engage with other parties who also have a role to play in supporting child safety online.</p>		
<p>Measures</p>		<p>Timeline for future actions</p>
<p>Current</p>	<p>Future</p>	
<p>Vodafone's policy has been to share best practice on a pan-industry basis and to support new technology companies that are engaged in Child Online Protection issues. As an example, the first Vodafone Digital Parenting Magazine http://www.vodafone.com/content/dam/vodafone/parents/images_2012/pdf/magazine/vodafone_digital_parenting_issue1_lores.pdf that was launched in 2010 included advice on Facebook Privacy Controls and Google SafeSearch. Vodafone still continues to provide safety details of new services, see: http://www.vodafone.com/content/digital-parenting/tools/how-to.html</p> <p>Vodafone also commissions surveys on young people's concerns on subjects such as cyberbullying and digital harm. See http://www.vodafone.com/content/dam/vodafone-images/parents/assets-2016/pdf/cyberbullying_survey.pdf</p>	<p>Business as Usual –</p> <ol style="list-style-type: none"> 1. When and where appropriate, Vodafone will raise potential child online protection issues on content, contact or conduct when in contractual negotiations with commercial partners delivering emerging services. 2. Vodafone will engage with companies looking to understand Child online protection issues and policy 3. Vodafone will not limit education and awareness information to its own services but look to provide pertinent information on other services. 4. Vodafone will continue to commission research into Children's online issues 	<p>Ongoing</p>



SECTION 3. AWARENESS RAISING

8. Supporting the development of awareness-raising campaigns about online safety, digital empowerment, and media literacy through both ad hoc and ongoing initiatives.		
Measures		Timeline for future actions
Current	Future	
<p>Since 2005 Vodafone's policy has been to support parents in making informed decisions by developing relationships with schools, NGOs and government departments, as appropriate in each market. This is predominately made available on our (And/or partner NGO) websites and in some markets physical collateral such as Vodafone Digital Parenting magazine (now an annual publication, as of May 2016 it has distributed over 5 million copies over 5 editions)</p> <p>http://www.vodafone.com/content/digital-parenting/learning-and-fun/digital-parenting-magazine.html and Web Super Skills (700,000 in 7 markets)</p> <p>http://www.vodafone.com/content/digital-parenting/learning-and-fun/web-super-skills.html</p> <p>The Be Strong emojis https://www.flickr.com/photos/vodafonegroup/sets/72157658628177755/ were chosen by 5000 teens that took part in a survey, there has been a 153.5million reach across social and online media and 865,349 views of influential YouTubers' videos about the emojis and cyberbullying Please see ICT Coalition Implementation Report Principle 6- Education and Awareness for local details</p>	<p>Vodafone, in partnership with the Diana Award, is trialling a peer to peer digital resilience initiative of 10 modules – 'Be Strong Online' that will be rolled out across our EU markets including a website hosting all of the resources, with interactive content and rewards for children/feedback for teachers http://bestrongonline.antibullyingpro.com/</p> <p>Vodafone is also developing a Digital Lives training module for parents on digital resilience, in 9 languages that will be made available to customers direct from our Digital Parenting website and via our partner NGOs (in all Opcos) to parents and where approved or permissible, schools.</p>	<p>Roll-out across EU markets 2017 - 2019</p>



9. Promoting children's access to diversified online content, opinions, information and knowledge.		
Measures		Timeline for future actions
Current	Future	
Vodafone Policy is to inform parents with websites or apps that have been recommended by parenting organisations or child educational specialists See My Tech Family http://www.vodafone.com/content/digital-parenting/learning-and-fun/fun-things-to-try.html	Within the Be Strong Online modules there are a number of learning activities centred on understanding the source of content/views found on the internet to encourage the development of their critical thinking abilities.	

SECTION 4. OTHER TYPES OF ACTIVITIES

10. Other types of activities concerning online safety for minors.		
Measures		Timeline for future actions
Current	Future	
N/A	Vodafone Instant Network Schools enable young refugees and teachers to access digital educational content and the internet improving the quality of education in some of the most marginalised communities where Vodafone operates. The programme will include access to the Be Strong Online modules to support children outside of Europe to become safer online.	

