Implementation Questionnaire

Telia Company
2021

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

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1. Name of the company on whose behalf this submission is made:

Telia Company

2. Country or primary markets where products/services are offered (in EU) to which this submission applies In which European markets does your company operate

Estonia, Latvia, Lithuania, Sweden, Finland, Norway, Denmark

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

Mobile and fixed telephone connectivity
Mobile and fixed connectivity and internet access
IPTV and/or cable TV (available in Sweden, Finland, Denmark, Estonia and Lithuania)

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

Name: Heddy Ring

Position: Sustainability Manager

Email: heddy.ring@teliacompany.com

Principle 1 – Content

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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 recognised system of content labelling.
- 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.

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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): ....

Telia Company does not provide its own content, platforms for user generated content or Social networking services.

As a distributor of third party professional content, Telia ensures, through its contracts with content providers, that the content is classified according to the applicable content classification requirements. This offers consumers the possibility to provide feedback.

Also, customer can always use normal customer care channels for any type of feedback on our services and there is also a reporting instruction available, for example:

Notification & violations - Telia.se

If yes, please provide details:

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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:

Telia provides the technical child safeguarding service F-Secure Safe as part of our offering to families. The service enables parents to set screen time limits, it allows parents to choose when it is time for the child to put the device away. App control lets parents see which apps their child has installed and decide if they should be blocked, allowed, or time-bound. Content blocking allows parents to decide which content they consider appropriate for their child's age. Finder lets parents locate their children's devices and see them on a map.

Telia uses a net based filter to block access to websites classified by the police to carry Child Sexual Abuse Material.

More information here: TECHNOLOGY TO PROTECT AND EMPOWER CHILDREN - Telia Company

Telia IPTV services includes child safeguarding features:
−   Linear TV:
     −   Option to block age-rated programmes
     −   Adult (+18) channels pin controlled (if such channels are provided)
     −   Option to hide adult (+18) channels from the TV guide (if such channels are provided)
−   Video on Demand (VOD):
     −   Different levels of restriction based on certificate ratings that correspond with the film rating system
     −   The Adult on demand menu is automatically PIN controlled at all times

3. Do you provide any *information, educational resources or advice for users* in any of the following areas?
(tick as many as apply)

☐ *Content classification or labeling guidelines*
☑ *How to block or restrict access to content*
☐ *How to report or flag content as inappropriate*
☑ *Safe searching*
☐ *Information about your company's content policy in relation to children*
☐ *Not applicable* (please explain): ....

If yes, please provide details including the format of any material provided (video, text, tips, games, FAQs, etc.):
Telia offers client based child safeguarding tools (F-Secure SAFE) to its customers and in connection to that guidance on how to use these in terms of safe searching, blocking or restricting access to inappropriate content.

On the web sites there are advice to customers on how to use mobile phones in a safe manner.

In addition we have provided advice to parents regarding how to support their children in safe online behavior, healthy online life and gaming responsibly: Guide materials to parents - Telia Company

We also organize various workshops and digital skills programs in our markets to increase the digital skills of children. For example Mobile driving licence educational program in Sweden, "Growing up in the internet" educational program in Lithuania and "Greatest Courage" anti-cyberbullying program in Estonia. More info here: CREATING AWARENESS - Telia Company

4. Where is your company's _Acceptable Use Policy_ (AUP) located?

There is currently no P2P/social media interaction on Telia's services.
Telia does not provide own content or platforms for user generated content.

General terms and conditions:
https://www.telia.fi/toimitusehdot-ja-palvelukuvaukset
http://www.telia.se/privat/villkor/
Terms and conditions of withdrawal | Telia Customer Service
http://telia.dk/omtelia/betingelser
https://www.telia.ee/ettevottest/lepingud-ja-tingimused
Technical specifications and contracts - Telia
https://www.telia.lt/autoriu-teises

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)?

☐ *Yes*

☐ *No*

☑ *Not applicable* (please explain): ....

Telia does not provide own content or platforms for user generated content.

If yes, please identify relevant policy:

6. Do you provide notice about the _consequences for users_ if they post content which violates terms of service or community guidelines?

☐ *Yes*

☐ *No*

☑ *Not applicable* (please explain): ....

Telia does not provide own content or platforms for user generated content.

In the terms of service we inform about the blocking of websites carrying child sexual abuse material. Example: http://www.telia.se/privat/om/anmalan-overtradelser?intcmp=fp_om-telia_anmalan-overtradelser

If yes, please identify relevant policy:

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:

Internet services:

In cooperation with its partner F-secure Telia Company provides various child safeguarding tools/features through the service SAFE, in relation to its fixed and mobile internet services, such as:
- Filtering of inappropriate content
- Time-control
- Blacklisting of contacts and web-pages

Finland: https://www.telia.fi/kauppa/palvelut/tietoturva
Sweden: https://www.telia.se/privat/bredband/tjanster/produkt/f-secure-safe
Estonia: https://www.telia.ee/era/lisateenused/viirusetorje-telia-safe
Lithuania: https://www.telia.lt/privatiems/internetas/ismaniosios-paslaugos/antivirusas-plius
Denmark: https://www.telia.dk/privat/underholdning/telia-secure/

TV:
- linear channels
    - Option to block age-rated programmes
    - Adult (+18) channels pin controlled (if such channels are provided)
    - Option to hide adult (+18) channels from the TV guide (if such channels are provided)
- Video on Demand (VOD) services
    - Different levels of restriction based on certificate ratings that correspond with the film rating system
    - The Adult on demand menu is automatically PIN controlled at all times
- In Lithuania we offer "Vaikų kampelis" (Kids' corner) on IPTV
    https://www.telia.lt/privatiems/televizija/ismanioji/vaiku-kampelis

- Kids cannot access content for adults
– Age filters allowing children watch relative content
– Time restriction for watching

2. If applicable, please describe the features offered by the _parental controls_? E.g. restricting web access, customization, monitoring, other restrictions…..

The child safeguarding product Safe, provided by F-Secure, that Telia offers, allows the user/parent/caregiver to set time restrictions for browsing and if there are certain websites that the child should not have access to (inappropriate content). Also search results can be filtered to ensure safe search for children, preventing children to encounter inappropriate content.

It is possible to customize profiles and create unique profiles for numerous users by creating different age profiles and customize them to block or allow certain types of sites based on certain preferences (filter out unwanted content).

Ex of instructions for installation and the choices you can make:
https://www.telia.se/privat/support/info/anvand-surfskydd?p=f-secure-safe

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*

Telia is working to increase the visibility and awareness of child safeguarding tools by different marketing and communications efforts and providing advice for installation and use of the tools.

Ex of instruction and support available for Swedish customers:
https://www.telia.se/privat/support/f-secure-safe
Example for Finnish customers:
https://www.telia.fi/kauppa/liittymat/liittyma-lapselle

[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?

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 behaviour.
- 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

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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.
Telia doesn't provide own content or platforms for user generated content and therefore don't deal with such abuse. However, it is possible for anyone to report abuse and or misuse of any sort or any customer issue through customer service contact points, e.g. retail outlets, contact centres and online contact channels. Telia's general service terms include company policy regarding the misuse in the Telia networks: https://www.telia.fi/toimitusehdot-ja-palvelukuvaukset http://www.telia.se/privat/villkor/ https://telia.no/kundeservice/ordre-avtale http://telia.dk/omtelia/betingelser https://www.telia.ee/ettevottest/lepingud-ja-tingimused https://www.telia.lt/sutartys https://www.telia.lt/autoriu-teises
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).

As we are an Internet access and service provider we are asking the users to report abusing from various sites with user generated content to the Police.

We also guide customers to report Child Sexual Abuse Material to the Police or to ECPAT (part of INHOPE).

TECHNOLOGY TO PROTECT AND EMPOWER CHILDREN - Telia Company

Ex from Telia Sweden:

http://www.telia.se/privat/om/anmalan-overtradelser

[Please provide details including links or screenshots as relevant]

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): ....

Links for reaching abuse team and report Child Sexual Abuse Material is put on a certain page on web site (see above).

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): ....

5. Which of the following _kinds of content_ can users report?

Such as intrusion attempts or received spam as well as any illegal material, such as child sexual abuse material, found on web pages.

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): ....

Ex: https://www.telia.se/privat/om/anmalan-overtradelser?intcmp=fp_om-telia_anmalan-overtradelser

We also link to the web based reporting information of the police.

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

E-mail to abuse department. Customer care channels.

[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,

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): ....

2. Please outline briefly the procedures to be followed if illegal content were to be discovered on your service.
If illegal content is reported the person reporting it is asked to report this directly to the Police or to ECPAT/INHOPE.   Procedure may vary somewhat between countries but in general the following process applies at Telia to Child Sexual Abuse Material CSAM: If CSAM was discovered by Telia, or by the public, who notify Telia of CSAM through customer channels, like call centre or online contact form, the Abuse team would be notified, who in turn would notify the national police. Dependent on police request and the legal requirements, the content would be removed or quarantine to enable investigation.   Any CSAM discovered by police or Hotline will be handled by the police and dependent on police request and the legal requirements, the content would be removed or quarantined to enable investigation.   Through partnership with national law enforcement agencies, Telia is actively engaged in blocking access to websites containing child sexual abuse content on its fixed and mobile broadband. The process is that the national law enforcement agency provides Telia with a list of illegal sites to block. Telia does not in any way interfere with the list.

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): ……………..

- Link to INHOPE TECHNOLOGY TO PROTECT AND EMPOWER CHILDREN - Telia Company
- Blog post: https://medium.com/global-network-initiative-collection/promoting-freedom-of-expression-while-fully-supporting-the-fight-against-child-sexual-abuse-8400f21406ca
- Partners like www.netclean.com and www.childhood.org
- links to child helplines partnerships - Telia Company

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?

Telia also applies a system for detection of illegal (classified by law enforcement) child sexual abuse materials on the internal IT-equipment and reports such detection to the police.

TECHNOLOGY TO PROTECT AND EMPOWER CHILDREN - Telia Company

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

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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?

Privacy - Telia Company
Privacy & Security - Telia Company

This principle refers to products and services that allow users to share their private data with each other. Telia does not offer this kind of social networking service and thus potential impact to increase child online safety is very limited.

Any person who signs a contract with Telia for a subscription must be 18 or older. Any known children's data is flagged and excluded from marketing campaigns.

Telia Company Group Policy – Privacy and Data Protection is valid for all customers. One main principle stated in the Policy is to pay special attention to the protection of children:

"Process personal data fairly and lawfully in all operations including when processing such data outside the country where it has been collected. Process personal data only to the extent necessary for explicit purpose applicable for that processing, while always paying attention to the protection of individuals' privacy and to interests of special user groups such as **children."** Privacy - Telia Company

In addition Country organizations have their own notices e.g. in Telia in Finland the public notice says:

"Telia processes children's personal data to the extent permitted by law, when appropriate in the case in question. Telia takes reasonable efforts to ensure and verify that the custodian of a child under the age of 13 has agreed to the processing of personal data, taking into account the available technology and the privacy risks related to the processing."

https://www.telia.fi/tietosuoja-ja-tietoturva/privacy-notice

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)*: See above..

If yes, please briefly outline available age-appropriate privacy settings (Provide details including relevant links/ screenshots on your website)

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):* ....

N/A, see above
[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?

☐ *Tips/advice to users at the point of setting privacy options*
☐ *FAQs*
☑ *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):* ....

Telia Finland has produced a set of educational videos to children explaining in a child-friendly way the terms of use and data protection issues. The videos were produced in collaboration with Save the Children Finland and feature a famous Finnish young influencer. Over 50 000 young people in Finland have viewed these educational videos. We are planning to produce similar videos also in other languages.
Link: Privacy and data security | Telia click: data protection for children and young people

[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.

Part of our advice to parents and children focuses on giving information on how to manage privacy settings on online services in general, e.g. social networks, games consoles and TV.
We are providing workshop modules that can be carried out by Telia volunteers or school teachers on safe internet behavior, including online privacy and integrity. In addition we are providing guide materials for parents, created in collaboration with Save the Children Finland.
CREATING AWARENESS - Telia Company click: Awareness building school workshops and click: guide materials to parents.

Example Lithuania: Safety online trainings (webcast and live) by Telia employees in Lithuania. Around 90,000 children have been reached through the live and webcast lessons. CREATING AWARENESS - Telia Company click: Growing up in the internet
Example Sweden: https://www.telia.se/privat/om/surfa-sakert?intcmp=fp_om-telia_surfa-sakert
Example Finland: https://www.telia.fi/kauppa/liittymat/liittyma-lapselle/lapset-netissa-opas
Example Estonia: https://digitark.ee/teemad/digitarkus-ja-elustiil/digitarkus-ja-lapsed/

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

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1. Does your company provide its own _educational resources_ aimed at any of the following groups?

- ☑ Younger children, i.e. under 13s
- ☑ Teenagers <18s
- ☑ Parents and carers
- ☑ Teachers and other adults
- ☐ Others (please specify): ....

We have created parental guides for parents safe online life, responsible online gaming and digital wellbeing. Link: Guide materials to parents - Telia Company

We also provide workshop materials for schools on the topics of online safety and privacy. Link: CREATING AWARENESS - Telia Company click awareness-building school workshop.

In addition our Telia employees regularly volunteer to carry out school workshops and we have various educational resources, awareness campaigns and materials available in our markets. CREATING AWARENESS - Telia Company

During 2020 we reached about 33,000 children and 66 000 parents and guardians through various initiatives to increase children's digital skills and support families in their efforts to keep children safe online.

As part of the Safer Internet Day 2020 celebrations, Telia opened its offices in all our markets to children and adults to raise awareness about how to have a happier and safer online gaming experience through live-streamed webinars and a panel discussion, as well as gaming events with professional gamers. During 2021 we focused the Safer Internet Day events for children and parents in all our markets on the topic of misinformation online.

In Estonia, Telia continued its „Greatest Courage" initiative to educate children, families and teachers about cyberbullying and create awareness about cyberbullying in society in collaboration with the Estonian Union of Child Welfare, The campaign has received widespread attention and led to significant results: we trained 1000 children directly through workshops and webinars on cyberbullying, reached 700 000 people via awareness campaign efforts and 18 000 children, teachers and parents used advice and support materials available at the "Greatest Courage" central website.

In 2020 we also started to broadcast the live "Interactive classroom" program to schoolchildren from 7th to 12th grade in Estonia in our own tv channel Inspira. Experts share their learning experiences and best practices for online home schooling, remote young students can interact and ask questions, parents will gain greater understanding and teachers learn how to improve their learning capabilities online. The program was aired in cooperation with Estonian Ministry of Education and Research and the Union of Educational Technologists.

Since 2015 Telia Lithuania has been running the „Augu Internete" (Growing up on the Internet) project. The goal is to educate kids and parents about online safety, which is being done by providing useful and informative content online both for parents and teachers, as well as Telia volunteers regularly visiting schools around Lithuania to give workshops to children in school classes. Since the beginning of the program, we have already talked with every 5th school student in Lithuania, almost 90 000 students in total. In 2020 the safer internet workshops for children were carried out mostly online due to Covid19, and more than 1500 children participated. Close to 10 000 parents and teachers visited the central website for materials and advice on online safety, there was a clear increase in the need to educate children on online safety due to the start of remote digital schooling caused by Covid19 restrictions in Lithuania.

In Sweden Telia in collaboration with child rights organization Friends launched a Mobile Driving License - a knowledge bank and a test for a safer life online. The purpose of the Mobile Driving License is to support children and parents in navigating safely in the online world, based on an open dialogue where parents get opportunities to listen to their children's reasoning and experiences.

In Finland Telia in collaboration with Save the Children Finland launched a digital parenting package- a set of guide materials for parents to support their children in safer online life. In summer 2021 already more than 10 000 family customers had downloaded the materials. In addition Telia Finland carried out an extensive campaign „What did you do today?" encouraging parents to talk to their children about life online and sharing educational training videos that featured well-known local family influencers. In addition, Telia Finland in collaboration with Save the Children Finland has launced a series of educational videos for teenagers with simple and clear language about privacy and data protection online, that vere viewed more than 50 000 times in the social media channels that are popular among children.

Telia company regularly carries out Children's Advisory Panel about children's experiences with life online and publishes the results to give children a voice. These results and insights from children are also shared with family customers to support them in better understanding and therefore better supporting children in their online lives.

2. Which of the following _topics_ are included within your own company educational materials?
(tick any that apply)

☑ Online safe behaviour
☑ Privacy issues
☑ Cyberbullying
☐ Download and copyright issues
☑ Safe use of mobile phones
☑ Contact with strangers
☐ Other topics (please specify) ....

3. With reference to any educational material you provide, _which of the following methods do you use_?
(tick any as apply)

☐ Documentation provided with product/contract on purchase/first registration
☐ A required presentation by salesperson completing sale
☑   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
☐ Helpdesk (telephone or online)
☑ Other (please specify): Websites, social media, workshops in schools, webinars, direct communication to family customers (parents) etc.

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

Telia Company website has links and information about our partnerships, such as World Childhood Foundation, Save the Children as well as links to all local child helplines:
partnerships - Telia Company

Telia in Sweden has a partnership with NGO Friends to work against net-bullying
https://www.telia.se/privat/om/schysstpanatet?intcmp=hatahat_subhero_friends
Telia Sweden also supports the child helpline Bris:Telia Company supports children's rights organization during Coronavirus crisis - Telia Company

Telia in Finland has a partnership with Save the Children and has jointly produced parental guide materials
https://www.telia.fi/kauppa/liittymat/liittyma-lapselle/lapset-netissa-opas

Telia in Estonia has a partnership with Lastekaitse Liit (Estonian Union for Child Welfare) to work against net-bullying.

http://www.lastekaitseliit.ee/

Telia in Lithuania has a partnership with Vaiku Linija for various child online safety issues. http://www.vaikulinija.lt/

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?

Telia is a signatory to a number of self-regulatory initiatives in the area of Protection of Children online, and we drive our work to at least comply with the principles set by these initiatives. The signed initiatives are GSMA Mobile Alliance Against Child Sexual Abuse Content (2008), ICT Coalition for Children Online (2012), GSMA MoU with Child Helplines International (2014) and the Alliance to better protect minors online (2017).

We participate in a number of initiatives at Group and national levels, e.g. cooperation with national INHOPE and INSAFE organisations for promotion and dialogue.

Telia is co-operating with security vendor F-Secure in order to build better marketing campaigns and increase awareness when selling internet security services to customers incl. child safeguarding tools.

Telia is co-operating with technology provider NetClean and promotes their products for detection of child Sexual Abuse Material in company IT-networks and equipment.

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.

See point 4 above.

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.

The topic is integrated in most of our educational programs mentioned in question 1. above. In September-october 2021 we are focusing our Children's Advisory Panel on children's media literacy and experiences with misinformation online. Together with World Childhood Foundation and local child rights organisations and research company Ipsos we are carrying out co-creative school workshops on this topic for 500 children in 5 countries and in addition we carry our surveys among 5000 children about how they

discover and handle misinformation online. We will share these findings with our employees, family customers and society as a whole and will use these insights to create educational materials for children and families on media literacy. CHILDREN'S PARTICIPATION - Telia Company

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.

We have created parental guides for parents safe online life, responsible online gaming and digital wellbeing. Link: Guide materials to parents - Telia Company

In Sweden Telia in collaboration with child rights organization Friends launched a Mobile Driving License - a knowledge bank and a test for a safer life online. The purpose of the Mobile Driving License is to support children and parents in navigating safely in the online world, based on an open dialogue where parents get opportunities to listen to their children's reasoning and experiences.

In Finland Telia in collaboration with Save the Children Finland launched a digital parenting package- a set of guide materials for parents to support their children in safer online life. In summer 2021 already more than 10 000 family customers had downloaded the materials. In addition Telia Finland carried out an extensive campaign „What did you do today?" encouraging parents to talk to their children about life online and sharing educational training videos that featured well-known local family influencers.

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

In addition to information submitted related to implementation of the ICT Principles, the following supplementary information supplied in either written form or in discussion with companies provides valuable context and information about the functioning and effectiveness of child safety provision.

1. In respect of ICT Principle 1, that companies should "continue work to provide innovative solutions able to support child safety protection tools and solutions", please elaborate on company investment in child safety measures, including research. Elaborate also, where possible, on planned future implementations.

   i. Telia Company is a founding partner of World Childhood Foundation to support the work and finding solutions against child sexual abuse materials online.

   ii. Telia has partnered with child rights organizations and schools to design a Children Advisory Panel (CAP), active in seven markets in the Nordics and Baltics. CHILDREN'S PARTICIPATION - Telia Company. The partner schools host co-creation workshops related to the opportunities and challenges in their online lives. The workshops are conducted in cooperation with World Childhood Foundation, local child rights organizations, like Save the Children, for professional support on the children's perspective, and a professional research company. The work is done in small groups in the class using different co-creation methods. In addition a quantitative questionnaire is carried out among children. So far around 10,000 have participated by describing and discussing the opportunities, benefits and challenges of life online. The aim of the CAP initiative is to further develop Telia's understanding of how we as a company can improve our own approach to children as users of our technology, and to contribute to the ICT industry's and society's understanding of children as online citizens. The findings are shared to improve Telia Company's approach to children's rights as users of our technology and to contribute to the industry and society's understanding of children as online citizens.

   iii. Telia Company has during 2016 completed an assessment in regards to Children's Rights and Business Principles in collaboration with Save the Children and has worked on improvements in the field of how Telia as a company acts in relation to children's rights, including safety online.

   iv. In addition to above Telia has formed partnerships and makes investments on local level on child safety issues. For example
   Telia in Sweden work together with the organization Friends https://friends.se/en/ against net bullying.
   Telia in Finland has a partnership with Save the children for digital services and children online.
   Telia in Estonia has a partnership with Lastekaitse Liit (Estonian Union for Child Welfare) to work together against net bullying.
   Telia in Lithuania makes a number of local investments on safety for children on line in partnership with "Vaikų linija".

2. Any further data that companies may be able to provide regarding the functioning of child safety features would be an extremely valuable outcome of this assessment.

Where possible, please provide any available summary data in respect of the following elements. (Stipulate where data should only be presented in anonymised form).

Take up or frequency of use of parental control tools on your product or service?

Incidence of reporting use/misuse, categorization and frequency of reports on your product or service? How many? By whom? Which problem?

Kinds of actions taken by the provider for different categories of reports. What was the outcome?

How do you evaluate the effectiveness of response to reports?

Privacy settings: the percentage of children who have private profiles, and those who have changed default privacy settings (and how/what did they change), by age, gender and country
N/A since we are a telecommunications service provider

Use of location-based services by children
N/A since we are a telecommunications service provider

Take up and use of education and awareness raising activities undertaken for your product or service?
During 2020 we reached about 33,000 children and 66 000 parents and guardians through various initiatives to increase children's digital skills and support families in their efforts to keep children safe online.

3. Please detail any additional measures adopted to evaluate the effectiveness of child safety features.