



Europe

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Third implementation review of the European Framework for Safer Mobile Use by Younger Teenagers and Children



About the Framework

As growing numbers of mobile operators offer their customers access to a rich and compelling range of content services, they are faced with the challenge of how to manage content which would have been subject to age restrictions if accessed through different channels. To address the issue directly and to create a framework within which a wide range of content services can be offered to customers, the European mobile industry developed, with the endorsement of the European Commission, the 'European Framework for Safer Mobile Use by Younger Teenagers and Children'.

The Framework contains recommendations designed to ensure that younger teenagers and children can safely access content on their mobile phones. These recommendations relate to:

- **Classification of commercial content** - mobile operators' own and third party commercial content should be classified in line with existing national standards of decency and appropriateness so as to identify content unsuitable for viewing by younger teenagers and children;
- **Access control mechanisms** - appropriate means for parents for controlling access to this content should be provided;
- **Education and awareness-raising** - mobile operators should work to raise awareness and provide advice to parents on safer use of mobile services, and ensure customers have ready access to mechanisms for reporting safety concerns; and
- **Fighting illegal content on mobile community products or the Internet** - mobile operators should work with law enforcement agencies, national authorities and INHOPE or equivalent bodies to combat illegal content on the Internet.

As of June 2010, there are 83 signatory companies implementing the Framework through the roll-out of national voluntary agreements, known as national codes of conduct. A further eight mobile operators have signed up to a national code of conduct only, but as such are still participating in the initiative. Codes of conduct are currently in place in 25 EU Member States and under development in the remaining two. This means that around **96 per cent** of all mobile subscribers in the European Union benefit from the Framework.

This document summarises findings from mobile operators in 24 countries, exploring how they are meeting and sometimes exceeding the requirements of national codes of conduct developed under the umbrella of the Framework.

To find out more about this third implementation review, including individual country-specific reports, please visit: www.gsmeurope.org/safer_mobile/implementation.htm.

The findings

1. The results of the third implementation review of the Framework in the EU27 show an overall high level of compliance of mobile operators with their national codes of conduct on child protection.

Compliance with national codes of conduct on safer mobile use by children is high across Europe, reflecting the priority that operators attach to this aspect of their activities. Under each of the Framework headings, we highlight below some examples of good practice, though these examples are not necessarily restricted to the countries mentioned, and may also be implemented by operators in other countries.

Operators in Europe have launched a range of **access control mechanisms**, designed to prevent younger teenagers and children from accessing age-inappropriate content.

In **Latvia**, operators demand age verification at the point of sale, allow customers to block WAP access on their children's phones free of charge and also offer special handsets with safety features, specifically designed to protect children from harmful content.

In **Greece** operators offer their subscribers the ability to activate access control mechanisms on own-branded content, based on classification, and oblige third parties offering content through their networks to implement such procedures too.

All **Bulgarian** operators restrict content by default, and require stringent age verification to activate it. These restrictions include identity / age checks at the initiation of the contract, warning pages, blocking pages, PIN codes and passwords.

In **Romania** operators work to **classify commercial content** appropriately, using strict guidelines to ensure that adult content is accurately identified and blocked from younger teenagers and children. These classification guidelines are also applied to third party content providers.

In **Ireland**, operators are working with government and the regulator to introduce a robust self-regulatory mobile content classification body. One operator benchmarks its own content using existing, industry standard guidelines, including the Irish Film Censor, the Broadcasting Commission of Ireland and the Advertising Standards Authority.

Italian operators use a variety of mechanisms to appropriately classify content, including daily monitoring procedures and colour coded icons to indicate whether content is universally acceptable, specifically aimed at children, aimed at older children in the presence of an adult, or finally, for adults-only.

Raising awareness and education about safer mobile use by children and younger teenagers is an important area where operators are working hard to make an impact.

Latvian operators employ a range of services to help share messages. These include specific areas of their own websites containing information to help users, support of NGO help lines, high profile events to draw attention to the issues and education for parents at the point of sale.

In the **UK**, operators have, as well as putting information on their own websites, developed standalone sites to raise awareness, and produced guides, pledge cards, DVDs and brochures, etc. This is alongside close

cooperation with organisations such as the Child Exploitation and Online Protection Centre (CEOP) and the National Society for the Prevention of Cruelty to Children (NSPCC).

In **Malta**, operators provide free and 24-hour help lines to give advice, and working with organisations such as the Ministry of Education and Culture, produce flyers, booklets, magazines and books. This is augmented by personal interaction with children through, for example, presentations at schools.

In the **Czech Republic**, operators have been actively **fighting illegal content on mobile internet networks**. All operators have implemented the provisions of the Framework and the Czech national code of conduct. They have implemented a tool for blocking websites with illegal content using black lists provided by the Internet Watch Foundation, and are cooperating with the Czech Hotline.

The Internet Watch Foundation black list is also used in **Slovakia**, where URLs on the open Internet can be blocked if they are found to be on the list. Other measures include help lines and the provision of relevant information to users. To ensure that illegal content is tackled effectively, operators work particularly closely with organisations that include the Ministry of the Interior, the National Safer Internet Node, UNICEF and law enforcement agencies.

2. Many of the national codes of conduct contain requirements that go beyond the scope of the Framework, demonstrating mobile operators' willingness to go the extra mile in encouraging the safe and responsible use of mobile phones by children.

While adhering to the Framework, many operators go beyond these already robust guidelines to ensure a safer mobile environment relevant to the countries and markets in which they work. The instances listed below are examples of these actions.

Polish operators monitor and verify implementation of the national code, particularly when new products and services are being introduced. Dedicated teams are responsible for such monitoring, who also work to prevent illegal or harmful content from being displayed.

In **Hungary**, operators are working with the National Communications Authority and Hungarian Mobile Marketing and Content Industry Association to launch an information and awareness website to make mobile services more transparent to users. This includes information on how to opt out of premium rate services, as well as more detailed information on content providers. Operators have also developed a separate Code of Ethics on marketing to children and younger teenagers. This code ensures that adverts accessible to young people clearly list the costs of services and strongly discourages advertising premium rate services directed specifically to this vulnerable group.

In **Denmark**, operators have undertaken to follow the Danish 'Consumer Ombudsman's Guidelines on Marketing Practices in Relation to Children and Young People', ensuring responsible behaviour when marketing to this age group. Operators have also worked with the Ombudsman to introduce a spending limit for customers, whereby an SMS is sent once the limit is hit and further purchases are barred. While designed for all customers, it is particularly relevant and helpful to children and young people. Initiatives on mobile bullying and age verification in chatrooms have also been introduced.

In **Belgium**, operators are working with the government and other stakeholders to address the issue of transparency and the potential for fraudulent or illegal behaviour in the third party content provider market. They are working to develop a database, under the auspices of regulator BIPT, for all kinds of third party

providers. While this is being developed, one operator is moving ahead with its own interim database that will make information on third party services, and who owns them, available to everyone via the internet.

In **Slovenia**, operators are similarly tackling transparency in third party providers by monitoring portals for potentially harmful content.

In the **United Kingdom** mobile operators are working to ensure that their activities keep pace with the rapid advance in mobile technologies such as the ability to track and trace mobile phones. All operators have produced a separate Code of Practice to govern the use of passive location specific services, ensuring that such services are explicitly consent-based and comply with existing legislation.

3. Feedback from child protection stakeholders indicates that national codes of conduct have played a key role in getting mobile operators engaged with each other and the NGO sector in making the mobile environment safer for children.

“We, Save the Children Denmark, are happy to state that the work of the Danish Mobile Network Operators is very positive in this aspect and we commend their pro-activeness in both the national as well as international context in driving key and pioneer projects safeguarding children and young people online.”

Save the Children — Denmark

“We rarely hear complaints about minors getting access to age inappropriate content or services and when we do we normally find they are the product of user error. Moreover in some of the things that the mobile companies have done e.g. deployed the IWF list, they have been exemplary. We have been able to point to them as role models in several areas and have suggested that other parts of the high tech industries could and should follow their lead.”

John Carr, Internet Consultant and Secretary of the Children’s Charities’ Coalition on Internet Safety — UK

“The national code has served as an official and straightforward statement of the mobile operators to commit themselves for promoting the safer mobile and internet use of children and young teenagers. The Code contains detailed action points and deadlines, for which, the operators are accountable. It addresses several issues to promote safety of children: content access controls, awareness raising campaigns, content classification and fighting against illegal content.”

International Children’s Safety Service — Hungary

“The Spanish operators have been promoting the safe and responsible use of ICT for years, and in this regard the national code of conduct has helped them to tackle this issue from a broader perspective, as a cross industry issue. It also has strengthened the collaboration between Industry and NGOs in a reciprocal way.”

Protegeles — Spain

“The national code of conduct provides a common ground and facilitates the coordination of the providers’ actions in the aforementioned areas. The Greek Mobile Operators have participated and provided information on their actions in multiple Safer Internet Day events, where they presented their actions and their approaches for dealing with the child safety issues. Furthermore, they provide instructional and educational leaflets, FAQs and guidance articles in physical form as well as in their websites.”

National Centre of Scientific Research (DEMOKRITOS) — Greece

While operators' work to date has been broadly appreciated and acknowledged, there is an expectation that they can do more, particularly in the light of fast developing new technologies.

While acknowledging efforts to date, raising awareness of fast-moving mobile internet issues amongst parents is often cited as a key priority in stakeholder feedback in some countries. In Belgium, for example:

"Mobile phones are no longer the 'telephones' they used to be. Today, they have evolved towards mini-computers. Research shows that parents do not necessarily understand this evolution, which makes parental guidance on mobile phone use even less likely than guidance on the use of the Internet. The 'education and awareness' area of the code of conduct might help to fill this gap."

Child Focus — Belgium

And in Latvia:

"Currently the use of mobile phones has become a natural necessity not only in everyday life of adults, but also for children and youngsters. Youngest users of mobile phones and features thereof mostly are aware and are informed about potential risks. However, judging by experience, when facing the real problem, the parents are asked for help only in the final stage. Thus especially high attention has to be devoted to informing and educating of parents about various children security related issues in the field of mobile communications - about both risks and opportunities."

Latvian Children's Fund — Latvia

In Denmark there is a sense that even more can be achieved if operators and NGOs further integrate to protect children and younger teenagers:

"...the mobile industry as a whole could be more proactive in consulting child protection NGOs on current and specifically future challenges of children's mobile use. It is important to reach out to the relevant groups to consult and see how our assessment on the mobile use of children and young people can be improved in regards to safety matters."

Save the Children — Denmark

For further information about the European Framework for Safer Mobile Use by Younger Teenagers and Children, visit www.gsmeurope.org/safer_mobile or contact Alice Valvodova at GSMA Europe.

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