Module 2: COP Guidelines for ICT Industry
Learning objective and agenda

*Understanding the Child Online Protection (COP) guidelines and introducing the Child Online Safety Assessment Tool*

✧ Introduction to the COP Guidelines
✧ Key Areas of the COP Guidelines
  ✧ Child ICT Use and Online Safety
  ✧ Online Child Sexual Abuse Material
  ✧ Children and Digital Literacy
  ✧ ICT’s as an Enabler
✧ Introducing the Child Online Safety Assessment Tool (COSA)
✧ Exercise: Child rights case studies - are they relevant to me?
Introduction to the Guidelines for Industry on Child Online Protection (COP)
A Roadmap to Protecting Child Rights

Key guidelines and frameworks leading up to and influencing the development of the COP guidelines

1948
- Universal Declaration on Human Rights adopted by the United Nations General Assembly

1989
- Convention on the Rights of the Child adopted by the United Nations

2008-9
- ITU launches the Child Online Protection (COP) Initiative, first version of the COP guidelines

2011
- UN Guiding Principles on Business & Human Rights endorsed by UN
- Protect, Respect & Remedy Framework

2012
- UNICEF, Save the Children and the UN Global Compact launch the Children’s Rights and Business Principles (CRBP)

2014
- Updated COP guidelines released to reflect new risks due to technology advancements, align to CRBP, UNGP

Human Rights
Rights of Children
Safe & Secure Use of Internet by Children
Business & Gov’t Impacts on Human Rights
Child Rights Beyond Child Labour
Industry Specific Tools to Manage ICT related Impacts
UNICEF/ITU Guidelines for Industry on Child Online Protection

The Guidelines provide advice on how industry can work to help ensure children’s safety when using the Internet

• Developed in 2014 as part of the Child Online Protection Initiative
  – An international collaborative network for promoting child online protection
• Extensive consultation took inputs from multiple stakeholder groups
  – International Organizations; Civil Society; Private Sector; Member States, Young People
• Provides a children’s rights based approach to digital business
• Align with the UN Guiding Principles on Business and Human Rights and the Children’s Rights and Business Principles

The purpose of the guidelines is to provide:
✓ A blueprint that can be adapted locally for various industry players
✓ A way of benchmarking against recommended actions
✓ Guidance on identifying, prevent and mitigating risks
✓ Guidance on supporting children’s rights
UNICEF/ITU Guidelines for Industry on Child Online Protection

*The Guidelines include principles and guidance that is aimed at a range of sub-sectors*

- Mobile operators
- Internet service providers
- Content providers, online retailers and applications (app) developers
- User-generated content, interactive and social media service providers
- National and public service broadcasters
- Hardware manufacturers, operating system developers and app stores.
UNICEF/ITU Guidelines for Industry on Child Online Protection

The Guidelines outline five key areas for protecting and promoting children’s rights in the online environment

- **Policies and management processes**: Integrate children’s rights in policies and management processes
- **Child sexual abuse material**: Develop processes for handling child sexual abuse material
- **Safer and age appropriate environment**: Create safer and age appropriate online environments
- **Educate children, parents and teachers**: Educate children, parents and teachers on child online safety
- **Promote positive use of ICTs**: Promote digital technology as a mode to further civic engagement

For companies that **develop, provide or make use of** information and communication technologies
Key Areas of the COP Guidelines
Children online safety

How, when and where children access technology is evolving fast, making it difficult to monitor and track

In 2014, iPad tops some of the world’s best known brands as the favorite among US children aged 6-12 years¹

• 58% of US tweens said they know how to hide what they do online from their parents

• 63% said “My parents know some of what I do online but not everything”

• 54% said “I don’t tell my parents about what I do online”¹
### Child online safety issues and risks

*Children can be victims, receivers, participants and initiators of risky online behaviour*

<table>
<thead>
<tr>
<th>Category</th>
<th>Examples</th>
</tr>
</thead>
<tbody>
<tr>
<td>Child sexual abuse</td>
<td>• Recorded images, videos and streaming of children subjected to sexual abuse and exploitation</td>
</tr>
<tr>
<td>Inappropriate content</td>
<td>• Exposure to violent or adult content</td>
</tr>
<tr>
<td></td>
<td>• Exposure to content that promotes self-harm</td>
</tr>
<tr>
<td>Inappropriate conduct</td>
<td>• Cyberbullying</td>
</tr>
<tr>
<td></td>
<td>• Trolling</td>
</tr>
<tr>
<td></td>
<td>• Self-exposure, sexting</td>
</tr>
<tr>
<td>Inappropriate contact</td>
<td>• Grooming</td>
</tr>
<tr>
<td>Commerce and addiction</td>
<td>• Predatory e-commerce (privacy, subscription terms, advertising, in-game purchases etc)</td>
</tr>
<tr>
<td></td>
<td>• Internet and gaming addiction</td>
</tr>
</tbody>
</table>
Online Child Sexual Abuse Material (CSAM)

The Internet has increased the scale and nature of the production and distribution of child abuse images

- Millions of child abuse images online
- Increased number of pages hosting abusive content
- Multiple formats (images, videos, online streaming)
- Downward age trend of victims
- Thousands of individual children depicted
- Images more graphic and violent
Digital literacy is key to the safety equation

While advances in technology are tracking down and stopping many perpetrators of online crimes, stakeholders have a shared responsibility to protect children online.

Parents
- Talk to your children about their technology use, social media and how to stay safe and good online behaviors
- Enable filters for age-sensitive content and use privacy settings

Children
- Learn how to become a responsible digital citizen and ways to discuss difficult topics

Companies
- Educate, implement policies and management systems, collaborate to combat illegal activities as well as up and down the supply chain with business partners

NGOs / Online Safety Experts
- Educate, research, advocate

Government
- Develop regulation that protects children
- Support ICT research and educational programs

Schools / Educators
- Ensure media literacy is on the curriculum (responsible ICT use, online safety)
- Consider partnering with governments and NGOs
Online products/services promoting education / engagement

However, companies can facilitate children’s positive use of ICTs

**Article 13 of the CRC**

The child shall have the right to freedom of expression; this right shall include freedom to seek, receive and impart information and ideas of all kinds, regardless of frontiers, either orally, in writing or in print, in the form of art, or through any other media of the child’s choice.

Internet technologies can help children to:
- Express their opinions and views
- Participate in digitized social functions
- Innovate and create solutions
- Bring forward problems and needs
- Demand government accountability
- Access information about their rights
- Access educational content and job opportunities
- Innovate and create solutions
Introducing the Child Online Safety Assessment Tool (COSA)
The Child Online Safety Assessment (COSA) Tool

Working with industry, experts, NGO’s and other partners UNICEF has developed a tool that can be used for child rights due diligence

- Based on the COP Guidelines and multi-stakeholder inputs
- Launched in 2016, it guides technology companies in assessing how the rights of children online can be further integrated into their business

The purpose of the COSA Tool and Guidance is to:
- Ensure companies understand the core issues and impacts to consider when assessing their management of child rights and the internet
- Offer an easy-to-use and comprehensive self-assessment of a company's management of and impact on child rights and the internet
- Uncover strengths and weaknesses in managing child rights and the internet
- Build prioritised corrective action plans to advance management practices and to address the highest risk areas
The Child Online Safety Assessment (COSA) Tool

The tool consists of a guidance document and an xls assessment mechanism structured by business departments

- The PDF companion guide
- Used in the assessment preparation, completion and for action planning
- The Excel-based questionnaire
- Designed to make it easy to:
  - Assess your performance against the criteria
  - Store the results and related evidence generated during the self-assessment
  - Complete a risk assessment
  - Create a prioritized action plan assigned to individuals

Example screenshot below:

<table>
<thead>
<tr>
<th>Topic</th>
<th>Assessment Criteria/Indicator</th>
<th>Result</th>
<th>Status and Evidence</th>
<th>[Optional] Risk (High, Medium, Low)</th>
<th>[Optional] Priority (High, Medium, Low)</th>
<th>Party Responsible</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.1</td>
<td>Policies on user-generated content</td>
<td>The company has adopted policies regarding ownership of user-generated content, including the option to remove user-created content at the user's request. The company removes content</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
The Child Online Safety Assessment (COSA) Tool
What it is, and what it isn’t

Built in partnership, it guides technology companies in assessing how the rights of children online can be further integrated into their business.

It enables companies to build enhanced online safety into their existing ways of working.

It provides a systematic evaluation and evidence base to support further action.

It helps raise awareness and build organizational capacity.

It is not a certification scheme and does not imply any endorsement by UNICEF.
The Child Online Safety Assessment Tool Process

**Coordinate Assessment team**
- With internal and external stakeholders
- Before, during and after the assessment
- Understand local operating environments and implications
- Understand child impact risks, impacts and potential solutions

**Engage**
- Identify lead + colleagues to support assessment
- Brief them; why assess? What’s required? how it will be used and the value to the business
- Include range of roles from managers to technical personnel
- Schedule and respect their time

**Complete self-assessment**
- Use guidance document to understand risks and actions you can take
- With colleagues, review each assessment criteria
- Assess your performance
- Record status and evidence in tool
- Allocate risk and priority

**Use outputs**
- Data and graphical outputs are available
- Can be used in presentations and as summaries
- Helps create action plans

**Business functions involved**

<table>
<thead>
<tr>
<th>Legal</th>
<th>Human Rights &amp; Corporate Responsibility</th>
<th>Human Resources</th>
<th>Procurement</th>
<th>Product Development</th>
<th>Sales/ Marketing &amp; Commercial teams</th>
</tr>
</thead>
</table>

Assessment preparation – engagement & planning considerations

Careful internal and external engagement can help inform the assessment, educate, build support and enable action

1. Identify leader to conduct assessment
2. Garner internal buy-in / communicate benefits of assessment
3. Map management/staff to be involved
4. Ensure representation from high-risk regions
5. Hold orientation discussions
6. Engage external experts on child rights

<table>
<thead>
<tr>
<th>Stakeholder</th>
<th>Role</th>
</tr>
</thead>
<tbody>
<tr>
<td>Human Rights/Corporate Responsibility specialist</td>
<td>Coordinating and leading the assessment</td>
</tr>
<tr>
<td>Senior Managers/Accountable role</td>
<td>Sponsoring assessment, ensuring buy in from colleagues, agreement to support resultant actions</td>
</tr>
<tr>
<td>Representatives from across business functions and markets</td>
<td>Ensuring local operations and conditions, as well as business process are understood across the company</td>
</tr>
<tr>
<td>Representatives from across business functions and markets</td>
<td>Making sure the company's self-assessment is accurate and comprehensive, including representing business partners and supplier performance</td>
</tr>
<tr>
<td>NGO's, Hotlines, Government Agencies, Academics etc.</td>
<td>Providing expertise on child rights; risks, issues, hotline and helpline availability, legislation and potential solutions.</td>
</tr>
</tbody>
</table>
The structure and scope of the COSA xls tool criteria

The Legal team is responsible for ensuring corporate policies and management processes comply with applicable legislation

- Policies and procedures for handling Child Sexual Abuse Material (CSAM)
- Policies on user generated content
- CSAM filtering and blocking
- CSAM reporting mechanism and access to hotlines
- Notice and takedown procedures
- Procedures for recording and retaining evidence
- Processes to ensure non-complicity in restrictions on legitimate activities
- Terms and Conditions of use prohibit storing, sharing or distribution of CSAM
- Prevention of misuse of payment services for illegal purposes
The structure and scope of the COSA xls tool criteria

The Human Rights and CR team coordinate the integration of child rights considerations into all appropriate policies and management processes

- Setting and implementing child safeguarding policies and procedures
- Understanding child rights impacts and associated risks to the business
- Engagement and consultation of internal and external experts
- Developing a network of people who champion child rights
- Developing metrics to monitor and evaluate performance
- Ensuring reporting mechanisms regarding potential child rights violations are accessible and easy to use
- Communicating status to senior executives and publically
- Aligning any corporate social responsibility programs so they support national development goals, education and access to ICT’s
The structure and scope of the COSA xls tool criteria

The Human Resources team works to ensure all employees are aware of child rights and exhibit appropriate behaviours

- Checking records of potential employees who may work with children to confirm they will not be a risk to children
- Ensuring all employees in roles that involve interaction with or the protection of children participate in targeted training on child safety
- Documenting and maintaining a training record
- Ensuring the company’s code of conduct for employees includes provisions that explicitly forbid accessing CSAM and other illegal behaviour
- Establishing a process for supporting employee wellbeing if their role exposes them to CSAM or other child rights violations
The structure and scope of the COSA xls tool criteria

The procurement team is responsible for working with suppliers to align values, expectations and performance regarding child rights

- Conducting due diligence on suppliers to identify if there are any prior performance concerns
- Evaluating risks and impacts in relation to supplier selection and review
- Ensuring supplier contracts incorporate the same requirements and standards for safeguarding children as the company’s policies and codes of conduct
- Ensuring all supplier employees in roles that involve interaction with or the protection of children participate in targeted training on child safety
- Documenting and maintaining a training record
The structure and scope of the COSA xls tool criteria

Product development teams are responsible for creating safer and age-appropriate online environments

• Ensuring that customers/parents and users/children understand safe online behaviours and controls
• Promoting helplines in local, age appropriate language
• Taking different age groups into account when developing products and services and promoting child rights
• Establishing appropriate age-verification and sign-on processes to determine whether users are old enough to access the content or service
• Moderating chat, image sharing, discussion groups and message boards to maintain a safe online environment
• Developing and applying community guidelines, an acceptable use policy and/or house rules for appropriate use of interactive services
• Encouraging a ‘self-regulating’ approach where users take responsibility for encouraging good behaviours
The structure and scope of the COSA xls tool criteria

Commercial teams are responsible for ensuring marketing, sales, products and services promote child online safety

• Providing transparent and clear customer information about the nature of the services that are offered, age restrictions and pricing
• Including a classification or age rating system to guide users, parents and teachers
• Complying with any legislation or international best practice in relation to collecting, using or disclosing personal identifiable or location information
• Ensuring any business partners work to the same standards as the company
• Ensuring all advertising, marketing and promotions are identified as such, and that there are clear limits for online advertising to children
• Checking that all advice provided to children is clear and understandable for the relevant ages/developmental stages
Getting the most out of the COSA assessment

Understanding what you can do with the results and how to maximize the value of the assessment

- Assessment evidence
- Focal areas for improvement
- Data and graphical outputs
  - Prioritised action plans
  - Allocated tasks
  - Build internal case for action
  - Focus on most material impacts
  - Use in transparency reporting
  - Support company training and learning
  - Use to benchmark across the organisation
  - Repeat and monitor performance
Supporting Other Corporate Assessments

Assessing impacts on children provides valuable intelligence for broader corporate risk and corporate responsibility assessments

- Identifying impacts that present significant business/financial risk (e.g. illegal activity resulting from child exploitation, child labour, unintended use of products, privacy violations)

- Understanding human rights risks associated with specific demographic

- Uncovering key social/environmental impacts and risks that may be overlooked

- Strengthen engagement with key stakeholder groups improving community relations, brand reputation and customer relationships

- Identifying strengths and weaknesses in managing issues that inform development of human rights / supplier responsibility policies, and broader corporate responsibility strategies
Case Study – Lego COSA assessment

LEGO, as part of its partnership with UNICEF, conducted a pilot of the COSA tool in 2015 identifying a number of improvement areas.

- LEGO’s online presence is growing and becoming more sophisticated
- It wanted to check it was doing all it could to promote and protect child rights
- It conducted an assessment involving personnel from across the business
- It found that its plans to update policies, procedures and practices were good
- Its approach of ‘designing in child safety’ was very effective
- Greater emphasis on providing contextual information in games for parents and children is beneficial
- Local and regional context was important

Founded in 1932, LEGO, is one of the world's leading manufacturers of play materials including the LEGO brick. Its mission is to Inspire and develop the builders of tomorrow.
Exercise – Child rights case studies – Are they relevant to me?
Exercise – Child Rights Exercise

Working in teams, identify if and how each case study is relevant to your local market and company

- Split into, at a minimum, three teams
- Consider each short case study
- Each team should start with a different case study

You have 15 minutes to answer these questions as far as you can:

1. Are these legal requirements?/is this situation relevant for my company and why?
2. Which company and external stakeholders should be involved/engaged re this case study?
3. Is this happening? Is there a local response/solution in place? What could be done?