

# Better Internet for Kids

## **Insafe Code of Conduct for working with industry partners** For public dissemination

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## Introduction

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The Insafe network, as formally established through the 2008 Insafe Memorandum of Understanding (Insafe MoU)<sup>1</sup>, comprises national awareness centres and helplines (hereinafter jointly referred to as Centres), as well as a European network coordinator (hereinafter also referred to as the Coordinator).

The Coordinator coordinates the network as part of a service contract it runs on behalf of the European Commission. This contract includes a wider range of online safety activities and campaigns, primarily at EU level. Meanwhile, national Centres run a variety of Safer Internet activities, typically at national level, as stipulated in their respective grant agreements, with a maximum European Commission co-financing rate of 50 per cent.<sup>2</sup>

The Insafe Code of Conduct for working with industry partners applies to the European network coordinator and to national Centres in as far as they represent or act on behalf of the Insafe network.<sup>3</sup>

## Vision and Mission statement

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The vision of the Insafe network is to create a better internet for children and young people.<sup>4</sup>

Its mission is to promote the safe, responsible, positive, creative, ethical use of online information and communication technologies, including the internet, while supporting children and young people, as well as their parents, teachers and care-takers.

More specifically, it aims at nurturing shared responsibility by government, educators, parents, media, industry and all other relevant actors for the protection of the online rights and needs of citizens, particularly children and young people, while embracing their rights to provision and participation. It aims at raising awareness, supporting and empowering users, fostering media and information literacy as well as digital citizenship, and promoting positive content.

The members of the Insafe network commit themselves to:

1. Share knowledge, information, resources and best practice.
2. Build expertise together about digital technology and online safety issues, while jointly developing insight and understanding into how to raise media and information literacy.
3. Foster synergy between awareness centres and helplines in order to achieve European added value, while raising awareness of the existence and the work of hotlines.

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<sup>1</sup> <https://www.betterinternetforkids.eu/documents/167024/6762604/Insafe+Memorandum+of+Understanding+-+MoU+-+2008+-+amended+2012+-+amended+2015.pdf>

<sup>2</sup> <https://ec.europa.eu/inea/en/connecting-europe-facility/cef-telecom/apply-funding/2020-safer-internet>

<sup>3</sup> Organisations involved in the network are committed to adopt or a similar Code of Conduct or comply with similar principles at organisation level and indeed many have done so already.

<sup>4</sup> <https://ec.europa.eu/digital-single-market/en/european-strategy-better-internet-children>

4. Promote a safer and better internet through common awareness-raising resources, campaigns and events.
5. Engage with children and young people, allowing them to express their views and pool their knowledge and experiences.
6. Offer online helpline services for reporting and dealing with harmful contact (such as grooming and online abuse), conduct (such as cyberbullying, hate speech and sexting) and content online.
7. Advise and support new members of the network.

## Working in partnership with industry

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According to the Insafe MoU, the Insafe network can co-operate with third countries and international organisations, including industry, for carrying out joint awareness-raising activities (awareness campaigns, awareness tools, and so on) and helpline services which are pan-European, multi-lingual and possibly multi-industry, as well as within the context of Safer Internet Day (SID).

The Insafe network has a track record of working with leading ICT and media companies across the value chain, including content providers, games platforms, hardware manufacturers, software providers, telecom operators and ISPs.

## Key principles

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While working with industry is important, the Insafe network broadly subscribes to a number of key ethical principles when establishing partnerships with commercial companies.

The principles outlined below apply to both the Coordinator and to national Centres. Given how the network is organised and structured, the Coordinator has a particular role and responsibility to ensure that these principles are being respected.

### 1. The best interest of children and young people

The best interest of children and young people should be the primary consideration for the Insafe network when deciding to work together with industry or establishing any kind of partnership.

Insafe network members recognise the important role that commercial companies play in developing and delivering products and services for children and young people in a fast moving online space, acknowledging also the considerable challenges they face in seeking to ensure the safety of children and young people using their products and services. Therefore, Insafe is committed to working constructively and positively with industry in trying to respond to these challenges in a well-informed, efficient and effective manner.

Importantly however, Insafe network members will do so without prejudice to the need to keep a critical distance, and with due respect for the rights of children and young people in a digital environment.

## 2. Transparency

The Insafe network will ensure transparency when working with industry or setting up industry partnerships.

The Coordinator will keep the Steering Committee duly informed regarding new and ongoing industry relationships at network level. The Steering Committee and Coordinator will avoid giving permanent affiliation to any third-party organisation. The Steering Committee and Coordinator should be able to decide, case by case, whether or not to co-operate with a specific industry initiative, and they will do as such following clear, ethical principles, while avoiding possible conflicts between European and national activity lines.

At national level, Insafe network members equally aim to have the appropriate procedures in place to document, in a transparent manner, the type of relationships they have with industry partners.

## 3. Maintaining independence

It is important for Insafe network members to be seen as independent. Working in partnership with a third party should not mean that network members are unable to comment about the company or organisation and its policies and practices. If, as part of the partnership, a non-disclosure agreement (NDA) needs to be signed, for instance around commercial confidentiality, the scope and terms of the agreement should be reasonable and proportionate.

## 4. Reputation and good name matter

The Insafe network brand is well respected. Network members are aware that being associated with industry can sometimes attract negative publicity and should therefore aim to be as transparent as possible about the way that they work with such organisations and why they think it is important to do so.

Promotional partnerships in particular can be very beneficial in multiplying the visibility of Insafe network member's overall messaging, allowing the network to reach audiences which it might typically struggle to target. Flagship actions or campaigns such as SID have particular potential to broaden the typical scope for partnerships. Yet, collaborations of this nature should primarily focus on promoting the key SID messaging that creating a safer and better internet for children and young people is a multi-stakeholder responsibility (hence, "Together for a better internet"). Care should also be taken to ensure that any collaborators recognise and respect the fact that SID is a global awareness-raising campaign with its roots in the EC, that the national Centre is the lead coordinator for any SID actions in that country, and that

there is no implication that collaborators “own” or are “approved by” the SID brand through their messaging. Equally, collaborators should refrain from commercial references or promotion of commercial products in their support of SID.

## Options for engagement

The type of industry partnerships the Insafe network – and particularly the Coordinator – engages with is varied.

In general, a distinction should be made between various forms of exchange, collaboration or in-kind support and any possible situation where an industry partner provides financial funds. While the latter situation is in no way problematic per se, it will require diligence with respect to the principles outlined above.

Key examples include:

- **Information exchange.** Awareness centres and helplines are able to provide valuable insight to tech companies about how their products are being used by children and young people and when reporting flows aren't working effectively. Similarly, tech companies and in particular social media platforms have a wealth of data which can provide useful information on latest trends, challenges and other activities that young people are involved in. Collaboration around these issues on an ad-hoc basis can be useful to both parties. Within this context, industry partners may be invited to online and/or offline network meetings.
- **Consultation on products.** The Coordinator and some individual Centres may be asked to comment on proposed changes to community guidelines or to contribute and provide feedback on a new resource that is being developed by industry.
- **Trusted flaggers.** Network members are often afforded trusted flagger status or provided with a dedicated (non-public) means of contacting a provider to escalate a specific case or to ask for support with a particular issue. In some cases, particularly where relationships are in development, these contacts are streamlined and/or nurtured by the Coordinator.
- **Safer Internet Day.** The Coordinator and Centres often work with third parties, including companies and organisations, on key awareness-raising campaigns such as SID. Actions might take the form of direct support for localised events, campaigns or resources, promotion of the day through their services or platforms, or through “supporter” status on the websites of national Centres (or the SID minisite) where third-parties are encouraged to promote the day through their own events and activities.
- **Other promotional partnerships.** The Coordinator and Centres are sometimes contacted by companies and organisations regarding other ad-hoc promotional partnerships, such as the offer of an article or other content for project websites and platforms, requests to sponsor or speak at an event, or requests for support on a research project or similar. The Coordinator and Centres should typically consider each such request on a case-by-case basis, taking into account the synergies with its work and the broader guidance set out in this document.

- **Membership of Safety or Advisory Boards.** The Coordinator and Centres are sometimes asked to sit on industry Safety and Advisory Boards. These meet at regular intervals and provide advice and guidance around policy and trust, safety and privacy issues, and similar.

If other types of partnerships are being developed or explored across the network, Insafe network members are committed to share their learnings and experiences with each other.

## Safety or Advisory Boards

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Where the Coordinator receives a request to sit on a Safety or Advisory Board on behalf of the network, this will be discussed with the Insafe Steering Committee before a decision is made.

The same principle holds for national Centres in as far as they act on behalf of the network and, in any case, Centres are encouraged to keep the Coordinator informed whenever they actively engage with a Safety or Advisory Board from an international company developing and delivering products and services for children and young people.

A number of considerations are relevant in this regard:

- Is the company sharing our common values and approaches?
- What is the added value of this collaboration in comparison to not collaborating at all?
- What is the likelihood of attracting public criticism by working with a particular partner? Can this be offset by the importance of working with a particular partner and the subsequent benefit to children and young people? For more formal partnerships, has a proper risk assessment been carried out?
- Which kind of permission will be given for the use of Insafe network logos on any collateral or campaigns?
- Will we retain the right to independence?
- Are we confident that the partnership will not be seen as an endorsement of the company's product(s) or services?
- Will we retain the right to be able to comment (critically if necessary) on actions taken by the company or service provider that we are in partnership with?
- Are we avoiding exclusivity? For example, do we reserve the right to form a similar partnership with another organisation?