

Child Rights Impact Assessment

Executive Summary

November 2022

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Introduction

At Telia we are technology pioneers and we have been digitalizing society for the past 170 years. Today our 20,000 colleagues serve 25 million customers across the Nordic and Baltic region with essential digital infrastructure and digital services that are fundamental enablers of the digital societies we live in. We have a deep social conscience that drives us to use our technology to be agents of improvement in society. Everything we do is driven by our purpose to reinvent better connected living so that people can live fuller lives, businesses can work smarter, and society and the planet can flourish together. Our commitment to Human Rights and Children's Rights is highlighted in our Statement of Materiality, ([Annual and Sustainability Report 2021](#), page 54), including our commitment to the UN Universal Declaration of Human Rights and the Children's Rights and Business Principles.



About the report

In line with the UN Guiding Principles for Business and Human Rights, Telia is committed to respecting human rights throughout its value chain by applying human rights due diligence. We are committed to undertake more in-depth human rights impact assessments (HRIAs) on topics and areas identified in our continuous due diligence process. In 2016, the Save the Children Centre for Child Rights and Business carried out a Child Rights Impact Assessment for Telia that was used to set up policies, processes and frameworks for our work with Children's Rights as a sustainability impact area. Since then, our work has evolved and we have been externally recognized as a "leader" in the Global [Child Forum's Tech and Telecom children's rights and business benchmark](#) for 2022.

In 2022, due to several societal changes impacting children, Telia decided to carry out a Children's Rights Impact Assessment of our business. The purpose was to understand to what extent we are identifying and mitigating risks to child rights and to

identify opportunities to support children's rights across our operations. For this assessment we used [UNICEF's Child Rights Impact Self-Assessment Tool for Mobile Operators](#) (MO-CRIA), primarily designed to offer an easy-to-use and comprehensive self-assessment framework for mobile operators to:

- more fully understand the challenges, opportunities and child rights impacts related to the industry and operations;
- analyze and manage potential and actual impacts on child rights, and build plans to enhance child rights management within the organization as well as mitigate potential negative impacts;
- uncover strengths and weaknesses in managing child rights within the company's current human rights framework.

This executive summary presents key findings of Telia's Child Rights Impact Assessment (CRIA) and the actions we are taking to further improve our work on children's rights.



Methodology

The Child Rights Self-Assessment Tool for mobile network operators features seven primary self-assessment categories for specific functional areas within a company: (1) corporate social responsibility and compliance; (2) children and digital environment; (3) human resources; (4) product, sales and marketing; (5) supply chain; (6) network operations; and (7) security.

The holistic internal self-assessment during Q2-Q3 2022 was coordinated by Telia Company's Group Sustainability team. Telia carried out a thorough desktop research and document review. The CRIA was also informed by extensive engagement with various internal stakeholders and interviews with internal subject-matter experts on Human Rights and Children's Rights, Responsible Sourcing, Marketing and

Advertising, Product Development, Speak-Up line, Human Resources, Security, Network Operations, etc. The self-assessment focused on one area at a time, based on the UNICEF MO-CRIA Self-Assessment guideline. The findings were then presented to two child rights organizations – World Childhood Foundation and Save the Children Finland – which both provided feedback based on their expertise and views. In addition, children's views were considered by analyzing the Children's Advisory Panel results from 2016-2021, an initiative carried out by Telia in collaboration with World Childhood Foundation to give children a voice about their online lives.

Findings of the assessment

The CRIA assessed Telia's potential impacts on children across our operations and supply chain. The assessment helped us identify the following areas for child rights risks, opportunities and impacts:

Impact area	Opportunity or risk	Telia's activities
Child online safety	Supporting the fight against Child Sexual Abuse Material online	Voluntarily blocking CSAM in own networks. CSAM detection software installed in employee computers with police reporting if CSAM is detected.
	Providing technical child safeguarding tools	Technical safeguarding solution for digital devices as well as pin-code based safeguarding for TV-service offered to customers.
Digital inclusion of children	Providing digital skills programs for children and educational materials for parents and schools	Children are one of the prioritized target groups in our digital inclusion agenda, aiming to reach 1 million individuals via our digital inclusion initiatives. Telia is offering various digital skills programs for children as well as support materials for parents and teachers.
	Supporting children's rights to participation, information, freedom of expression, play, education and more	Child participation via Children's Advisory Panel is designed to give children a voice about their online experiences and children's views are included and communicated through various processes internally and externally.
Marketing and advertising	Ensuring marketing does not target children inappropriately	Telia has developed children's rights and responsible marketing guidelines in collaboration with Save the Children The Centre for Child Rights and Business. The guidelines are available for all local marketing teams and external partners.
	Including diverse representation and role models in marketing, advertising and sponsorships	This topic is addressed in the children's rights and responsible marketing guidelines, available for all marketing teams and external partners.

Product development	Providing safe products and services	Targeted impact assessments have been conducted for certain products directed to children, such as smart watches for children. From 2022 general questions about impact on children have been integrated in our investment and product development processes to capture future products where child rights analysis may be needed.
	Respecting children's privacy in the collection, use and sharing of data	Child privacy perspective is addressed in the Data Protection Impact Assessment (DPIA) process
Responsible sourcing	Eliminating child labor	Addressed in our Code of Conduct and Supplier Code of Conduct. Child labour aspects addressed across the responsible sourcing processes.
	Providing decent work for parents and caregivers	Addressed in Supplier Code of Conduct and across the responsible sourcing processes.

As illustrated above, the CRIA shows that Telia is substantially integrating child rights perspectives in important processes. The company has governance structures and policies in place, and has extensive engagement with both children directly through Children's Advisory Panels and with child rights organizations, which guides and supports this integration.

The assessment highlighted possibilities to strengthen our efforts in some areas. Based on the findings we are taking the following actions:

Assessment area	Topic	Finding	Action taken or planned
Corporate responsibility and compliance	Policies	Code of Conduct has a potential to address the children's rights perspective more thoroughly.	Process of updating the Code of Conduct ongoing, by 2023. New version will have a specific chapter dedicated to children's rights. Children's rights to also be included in updated Code of Conduct mandatory trainings.
	Grievance mechanism	Grievance mechanism, the speak-up line needs to be assessed as to its effectiveness to address child rights issues.	Internal review on Speak-Up line ongoing during 2022. Engagement with group children's rights lead to identify relevant child rights issues.

Children and Digital Environment	Product development	Potential to integrate children's rights perspective better into the product development process.	Targeted impact assessments have been conducted for certain products directed to children, such as smart watches for children. From 2022 general questions about impact on children have been integrated in our investment and product development processes to capture future products where child rights analysis may be needed.
Supply chain	Training of and engagement with suppliers	Identify supplier categories facing higher risks on child labour and children's rights and include child rights training and capacity building into supplier engagement.	Project to identify and prioritize as to Third Party Human Rights in the full value chain ongoing, in collaboration with sustainability consultancy BSR.

We will continue to utilize the findings of this impact assessment to improve our efforts to protect and empower children and respect children's rights across our organization. More information about our work with children's rights as a sustainability impact area is available on our website and in our [Annual and Sustainability report 2021](#), page 95.