

Status of national child online protection ecosystems in South Eastern Europe



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Executive summary

Little in life is more important than protecting children from harm. Those responsible for protecting children are often unclear what the key issues are and how to effectively and sustainably tackle them. Given the great diversity and complexity of actors, technologies and agencies, as well as opportunities and threats, understanding the complexities of child online protection should be an imperative for all stakeholders.

High level and coordinated actions have great value in the complex space of child online protection. A multi-stakeholder approach has been widely implemented as the best method to tackle these issues.

To elaborate this report, preparatory desktop research and an online survey on the countries of Albania, Bosnia and Herzegovina, Georgia, Moldova, North Macedonia, Serbia, and Ukraine were organized in cooperation with relevant stakeholders.

Primary challenges common to the countries include:

- Creation, development, and implementation of national child online protection (COP) strategies and activities.
- Diversity in stakeholder involvement.
- Legal aspects of child online protection and child sexual abuse material (CSAM).
- Industry involvement and support.
- Awareness raising and educational campaigns.

Primary challenges identified and conclusions reached in this report should be further researched at a national level and addressed in a national child online protection strategy. The ITU child online protection guidelines reports are a useful tool as part of the action plan of a national child online protection strategy.

1 Introduction

The explosion of information and communication technology has created unprecedented opportunities for children and young people to communicate, connect, share, learn, access information and express their opinions on matters that affect their lives and their communities. Nevertheless, wider and more easily available access to the Internet and mobile technology also poses significant challenges to children’s safety – both online and offline. To reduce the risks of the digital revolution while enabling more children and young people to reap its benefits, governments, civil society, local communities, international organizations, and the private sector must come together in common purpose. At the national level, child online protection is a shared responsibility that requires coordinated action for prevention of risks and the response to them, on the part of government authorities, the private sector, and civil society. A comprehensive legal framework is an essential tool for promoting a supportive and safer online environment for children and young people. Furthermore, any national strategy has to be developed, implemented, and executed with a multi-stakeholder approach. While many countries have such a framework or strategy in place, many others do not.

The International Telecommunication Union (ITU) has addressed child online protection as a global concern for many years with sustained cooperation through a network of partners. ITU is fully committed to putting forward tools and mechanisms to further enhance collaboration and implement actions at the regional and national levels.

Sustainable Development Goals

In line with Resolution 179 (Rev. Dubai 2018) from the Plenipotentiary Conference of the International Telecommunication Union (Busan, 20141) and within the framework of the ITU regional initiative in Europe (WTDC-17, Buenos Aires) on enhancing trust and confidence in the use of information and communication technologies that aims to support the deployment of resilient infrastructure and secure services allowing all citizens, especially children, to use ICTs in their daily lives with confidence, a request from ITU was received to establish the stakeholder mapping exercise for better understanding the landscape of child online protection in the region.

Under the supervision of the ITU Office for Europe region, this report on the child online protection ecosystem sets out the state of play in terms of governance and stakeholder mapping in each of the following countries: Albania, Bosnia and Herzegovina, Georgia, Moldova, North Macedonia, Serbia, and Ukraine.

Protecting children is a common thread within 11 of the 17 Sustainable Development Goals. UNICEF puts children at the centre of the 2030 agenda as depicted in Figure 1.

Figure 1: Children, ICTs and SDGs



Source: ITU

ICTs have been recognized as a key enabler to attain the SDGs. Proper usage of ICTs improves access to basic services like education and healthcare, creates jobs, and empowers communities. More specifically, cybersecurity is enshrined in SDG 9 on industry, innovation, and infrastructure with the goal of building a resilient infrastructure, promoting inclusive and sustainable industrialization, and fostering innovation.

Children need to be equipped to make innovative yet safe usage of ICTs.

2 Methodology

This report was compiled following desktop research and online surveys (see Annex 1) with stakeholders in each country. Stakeholders were also contacted for interviews. The quality of data analysis for each country is highly dependent on the number and quality of responses received. There were times when reasonable assumptions were made due to unavailability of information from stakeholders.

Data from the 2018 edition of the Global Cybersecurity Index¹ was also used for this report. URLs and references given in this document were correct at the time of publication.

Generic steps

1. Deep dive desktop research was aimed to find valuable online information and organizations working in the field of online safety of children for each country.
2. Contact was made with stakeholder organizations and a request was submitted to fill out a stakeholder mapping form.
3. Communication with national contacts was maintained for clarity and further interviewing stakeholders and identifying additional activities.
4. Compiling the data and creating the overview for each country.

The data collected for each country has been synthesised in relevant sections depicting latest ICT statistics, observations, alignment with current ITU child online protection guidelines, stakeholder ecosystems and a country level analysis.

Stakeholders ecosystem

Child online protection is of concern to governments, educators, industry, and policymakers, and the issues and challenges identified reach outside national borders. As engaging all stakeholders is central to the future success of a national child online protection activities or strategies, all stakeholder groups should be actively contributing and participating in those efforts. For the purpose of this mapping, stakeholder groups have been identified as:

- Government bodies (ministries, law enforcement etc.)
- Industry (telecommunication, technology, and service providers etc.)
- Non-governmental organizations (NGOs) (charities, projects etc.)
- Parents (parental organizations)
- Children
- International organizations
- Educational institution (university, schools etc.)

¹ https://www.itu.int/dms_pub/itu-d/opb/str/D-STR-GCI.01-2018-PDF-E.pdf

Active organizations have been considered as those with researchable and published activities in the field of child online protection.

ITU new 2020 guidelines for child online protection

In this report, analysis mapped the current new 2020 ITU Guidelines for child online protection² to the situation in each Member State. The guidelines establish the necessary foundation for a safer and more secure cyber world for future generations. The guidelines are meant to be adapted and adopted by all different stakeholder groups. To date, four sets of guidelines have been developed:

- The ITU guidelines for children on child online protection³ offers advice on possible harmful activities online, such as bullying and harassment, identity theft, and online abuse. The guidelines also include advice to children seeing and experiencing harmful and illegal content online, or young people being exposed to grooming for sexual purposes, the production, distribution and collection of child abuse material.
- Guidelines for parents and educators on child online protection⁴ sets out how parents and educators can support children in their digital experience and help them to stay safe online.
- Guidelines for industry on child online protection⁵ provides advice on how the ICT industry can help promote safety for children using the Internet or any technologies or devices that can connect to it. An online platform of case studies from the broader ICT industry further complements the content of these guidelines.
- Guidelines for policy-makers on child online protection⁶ offers assistance to countries planning strategic actions for child online protection in the short-, medium-, and long-term.

Purpose

Every effort has been made to correctly point to the best sources of information for this document. However online safety issues and challenges are fluid, ever-changing, and highly complex. Comments from Member States related to updated information have been used. This report does not constitute legal advice, as the intention behind this report is to instigate a conversation in the direction of improving child online safety policies, creating or revising the national child online protection strategy and implementing meaningful actions including the further alignment with the upcoming revised ITU child online protection guidelines. Global Cybersecurity Index (GCI) information presented in this report is from 2018 and it is possible that since this study has been published, the information has changed.

² <https://www.itu-cop-guidelines.com/>

³ <https://www.itu-cop-guidelines.com/children>

⁴ <https://www.itu-cop-guidelines.com/parentsandeducators>

⁵ <https://www.itu-cop-guidelines.com/industry>

⁶ <https://www.itu.int/en/cop/Documents/guidelines-policy%20makers-e.pdf>

3 Albania

Table 1: Albania ICT statistics⁷

Global Cybersecurity Index 2018 ⁸	Score 0.631	Regional rank 36	Global rank 62
Member Lanzarote convention ⁹		Member We protect model ¹⁰	
8.6 Fixed-telephone subscriptions per 100 inhabitants		94.2 Mobile-cellular subscriptions per 100 inhabitants	
12.5 Fixed (wired)-broadband subscriptions per 100 inhabitants		62.8 Mobile-broadband subscriptions per 100 inhabitants	
21.6% Households with a computer		30.2% Households with Internet access at home	
71.8% Individuals using the Internet			

Table 2: GCI 2018 report: child online protection survey responses in Albania¹¹

Is there cybersecurity regulation related to child online protection?	√
Is there an established public mechanism for reporting issues associated with child online protection?	√
Do you have a national strategy for child online protection?	√
Is there a national body/agency for child online protection?	√
Are there public awareness campaigns on child online protection?	
For adults?	X
For youth?	√
For children?	√
Are there any child online protection education programmes?	
For educators?	X
For parents?	X
For children?	√
Has there been any activity by government or non-government institutions to provide knowledge and support to stakeholders on how to protect children online?	√

3.1 Observations

The online survey was distributed to relevant focal points in Albania. Responses from non-governmental organizations, one school, and one governmental organization were received. When questioned on of

⁷ https://www.itu.int/itu-d/apis/clients/res/pdf/country_profile/report_ALB.pdf

⁸ https://www.itu.int/dms_pub/itu-d/opb/str/D-STR-GCI.01-2018-PDF-E.pdf

⁹ <https://www.coe.int/web/children/lanzarote-convention>

¹⁰ <https://www.weprotect.org/member-countries>

¹¹ https://www.itu.int/dms_pub/itu-d/opb/str/D-STR-GCI.01-2018-PDF-E.pdf

the existence of the Safer Internet Centre in Albania, 33 per cent of respondents knew of the centre. On the topic of possession, storing, distributing, uploading, making and creating of CSAM, 55 per cent of respondents were unsure if it was illegal in Albania. Knowledge of a hotline (for reporting child sexual abuse material) in Albania was confirmed by 77 per cent of respondents. When asked, “In your opinion, how big is the focus on child online protection issues in your country?” respondents averaged a score of 2.36 (rating between 1: not important, and 5: very important). Lack of awareness around the online safety issues, education (parents and children) and parental controls have been highlighted as the most common challenges in Albania. There are existing organizations and projects in Albania that could be of great use in the field of online safety but are under risk of shutting down due to lack of funding¹².

The Global Alliance child report on sexual abuse online¹³ published in 2014, highlights the four main pillars to combat child sexual abuse online:

- Enhancing efforts to identify victims and ensuring that they receive the necessary assistance, support and protection.
- Enhancing efforts to investigate cases of child sexual abuse online and to identify and prosecute offenders.
- Increasing awareness among children, parents, educators and community at large about the risks.
- Reducing the availability of child pornography online and the re-victimization of children.

In 2014, the World Vision International¹⁴ reported the extent to which children in Albania access the Internet and the risks they face compared with children in other European nations.

In 2015, the Council of Ministers approved the “The Cross-cutting Strategy on Information Society 2015-2020”, a strategy based on the proposal of the Ministry of Innovation and Public Administration.¹⁵ This strategy reported progress since the first strategy in 2008 and communicated goals and challenges for the continued development of cybersecurity and safer Internet practices. The report specifically noted the education of youth in safe Internet practices as a priority of education and the protection of children’s rights as a priority of law enforcement.

On 6 February 2018¹⁶, CRCA Albania and ALO 116, in collaboration with the National Authority for Electronic Certification and Cyber Security, the Ministry of Health and Social Protection, the Ministry of Education, Sports and Youth, and the Ministry of Interior joined forces in celebrating the Safer Internet Day 2018. Activities organised under the celebration were:

- Development of a national action plan for child online protection and safety.
- Schools Awareness Campaign.
- Parents Open Forum.
- Review of Code of conduct for the communications companies with a focus on the protection of children.
- Children's Human Rights Centre of Albania (CRCA) and Albanian National Child Helpline- ALLO 116 presented the case studies collected from the ALLO 116 and from the National Platform for Child Online Protection.

¹² For example see <https://www.isigurt.al/>

¹³ https://ec.europa.eu/home-affairs/sites/homeaffairs/files/what-we-do/policies/organized-crime-and-human-trafficking/global-alliance-against-child-abuse/docs/reports-2014/ga_report_2014_-_albania_en.pdf

¹⁴ <https://www.wvi.org/sites/default/files/Internet%20Safety%20OK.pdf>- Zhilla, Fabian & Albania, World. (2014). A Study on Child Online Safety in Albania. 10.13140/RG.2.1.5136.3685.

¹⁵ http://akshi.gov.al/wp-content/uploads/2018/03/Digital_Agenda_Strategy_2015_-_2020.pdf

¹⁶ <https://www.alo116.al/en/albania-join-forces-child-online-safety>

Safer Internet Day in Albania

The Albania Safer Internet Day Committee and the CRCA organised the National Forum "Safer Internet for Children and Youth in Albania" on Thursday, 7 February 2019. The forum presented for the first time in Albania the results of a national report on child online protection based on the reports made to the national hotline www.ISIGURT.al.¹⁷ Albania joined Safer Internet Day celebrations in February 2005. Since then, many things have changed and improved. The code of conduct for safer Internet was signed as a joint commitment from the main ISP providers on February 2013. ISPs have adopted/ provided parental control tools to the public as well.

During 2018, National Authority for Electronic Certification and Cyber Security (NAECCS) in collaboration with UNICEF ALBANIA have established a guideline on "Peer educators for online safety". The guideline has been distributed to all secondary schools and have helped to teach more than 13000 children, and around 300 peer educators in seven regions of Albania.¹⁸ In 2019, NAECCS and UNICEF Albania established guidelines for industry on child online protection. The guidelines were based on the ITU child online protection guidelines, and contain specific measures for mobile operators, content providers, ISP and software developers. In November 2019, UNICEF organised a "VIRAL Summit: A better Internet for children and adolescents in Albania"¹⁹ to contribute to the Government of Albania's Action Plan for a better and safer Internet for children. In February 2020, the framework of Safer Internet Day 2020 NAECCS in collaboration with Tirana Municipality promoted the first #CyberCorner²⁰ in a library in the capital. Cyber Corner promotes online safety, initiatives on violent extremism, coding/programming and e-services. The topics have been elaborated in four manuals, which are given to children of secondary schools through interactive workshops.

Stakeholders ecosystem: Organisations active in child online protection

Government

- National Platform for Child Online Protection (www.ISIGURT.al)
- Government
- The National Authority for Electronic Certification and Cyber Security
- The Ministry of Health and Social Protection
- The Ministry of Education Sports and Youth
- The Ministry of Interior

Non-governmental organizations:

- CRCA-ECPAT ALBANA (Child rights centre) (<https://www.crca.al/sq>)
- ALO 116 (Albania national child helpline)

¹⁷ <https://www.betterinternetforkids.eu/web/portal/practice/awareness/detail?articleId=4070704>

¹⁸ <https://cesk.gov.al/aktivitete/peereducator.html>

¹⁹ <https://www.unicef.org/albania/stories/albania-committed-make-safe-internet-every-child>

²⁰ <https://cesk.gov.al/aktivitete/cybercorner.html>

Table 3: Compliance with ITU child online protection guidelines (Albania)

Children guidelines
There is an active helpline in Albania for children to contact in case of online safety concerns that also supports active education programmes for children. A central information hub is also active under the https://www.isigurt.al/ portal. It offers a starting point for devising and creating awareness campaigns aimed at educating and raising awareness about possible harmful activities online, such as bullying and harassment, identity theft, and online abuse. It is unclear if there is advice to children seeing and experiencing harmful and illegal content online, or young people being exposed to grooming for sexual purposes.
Parents and educator guidelines
There seems to be a gap in education programmes for teachers and parents on child online protection. Unfortunately, many adults are not even aware of the diversity and complexity of the online activities of their children. Educating and creating awareness campaigns for teachers, parents and guardians should be a priority.
Industry guidelines
Involvement of the industry representatives remains unclear in Albania. There is a significant gap in child online protection if industry is not involved in supporting the child online protection guidelines and taking an active part in raising awareness around the topic. There are many positive examples ²¹ across the Europe region where industry is taking an active part and contributing to child online protection. Mobile operators, content providers, Internet service providers, national and public service broadcasters are either enabling or providing Internet access and information to a great number of children in Albania. The actions and processes that the broader ICT Industry could implement will play a key role in ensuring that children enjoy the benefits of the digital technology within a safe online environment.
Policy-maker guidelines
A cybersecurity and child online protection strategy is in place in Albania, and while this is commendable, policy-makers must ensure that their strategies and activities have short, medium and long-term effects. There is a variety of factors and challenges that need to be considered in creating and implementing these documents and some of them revolve around observing and amending, if needed, the legal framework, advancing and maintaining law enforcement capabilities, and creating an appropriate ecosystem for reporting mechanisms for child online protection issues.

3.2 Analysis

While there are obvious diverse activities supporting child online protection in Albania, more coordinated activities, active support, and cooperation should be encouraged from all stakeholders. There are examples of government stakeholder agencies and departments involvement in policy creation and awareness activities. Further support and guidance is crucial to recognise the importance of child online protection in Albania to improve the implementation of educational activities.

Child online protection in Albania would benefit from greater involvement of industry stakeholders, ranging from mobile and Internet providers to general Internet technology companies, which need guidance on how to increase the level of active support for child safety activities and advancements. Some industry guidelines are in line with the ITU child online protection industry guidelines. With the existence of a child national helpline, this presents an opportunity to create a national Safer Internet Centre with awareness centre, a hotline, and the opportunity to hear children and young people.

A national Safer Internet Centre can present a platform for cooperation and coordination of various on-going activities and help with the creation and research of new activities. While there might be a hotline active in Albania, the establishment of such a reporting route will also raise awareness of how to report CSAM.

²¹ <https://www.itu-cop-guidelines.com/resources>

Education and training of professionals working with children should be a more important part of stakeholder activities to mitigate the risks and educate children, parents, teachers, and the public. While there have been some scientific research and surveys in this area, guidance from current and national scientific research in child online protection cannot be overstated.

4 Bosnia and Herzegovina

Table 4: Bosnia and Herzegovina ICT statistics²²

Global Cybersecurity Index 2018 ⁸ Score 0.204 Regional rank 43 Global rank 118	
Member Lanzarote convention ⁹	Member We protect model ¹⁰
19.6305 Fixed-telephone subscriptions per 100 inhabitants	104.126 Mobile-cellular subscriptions per 100 inhabitants
20.8655 Fixed (wired)-broadband subscriptions per 100 inhabitants	55.3806 Mobile-broadband subscriptions per 100 inhabitants
63.7587% Households with a computer	69.1942% Households with Internet access at home
70.1201% Individuals using the Internet	

Table 5: GCI 2018 report: child online protection survey responses in Bosnia and Herzegovina²³

Is there cybersecurity regulation related to child online protection?	X
Is there an established public mechanism for reporting issues associated with child online protection?	X
Do you have a national strategy for child online protection?	X
Is there a national body/agency for child online protection?	X
Are there public awareness campaigns on child online protection?	
For adults?	X
For youth?	X
For children?	X
Are there any child online protection education programmes?	
For educators?	X
For parents?	X
For children?	X
Has there been any activity by government or non-government institutions to provide knowledge and support to stakeholders on how to protect children online?	X

²² https://www.itu.int/itu-d/apis/clients/res/pdf/country_profile/report_BIH.pdf

²³ https://www.itu.int/dms_pub/itu-d/opb/str/D-STR-GCI.01-2018-PDF-E.pdf

4.1 Observations

From the online surveys and desktop research, existence of a Safer Internet Centre in Bosnia and Herzegovina is recognized. It has a broad range of activities in the field of online safety of children in Bosnia and Herzegovina with an active hotline (part of INHOPE, a network of hotlines combating online Child Sexual Abuse Material), helpline, and awareness centre. The Safer Internet Centre is operated by the International Forum of Solidarity (IFS), Emmaus International²⁴, and supported by various organizations and stakeholders in the field of online safety. The online surveys reported challenges to online safety in the absence of a legal framework that criminalizes different types of violence and crime as well as cyberbullying. There is need for general education and awareness raising in the field of online safety and protection of children. As a member of the BiH Child Protection Consortium (UNICEF BiH, Save the Children, and Emmaus), IFS-Emmaus is currently conducting a three-year initiative to support the government of Bosnia and Herzegovina and communities to address online child sexual exploitation and abuse.

Bosnia and Herzegovina set out policy targets and operational goals to combat child sexual abuse online on the Global Alliance Against Child Sexual Abuse Online²⁵ 2014 reporting form. Those targets involved the Council of Ministers of Bosnia and Herzegovina adopting the new National Action Plan against Child Sexual Abuse Online for the period 2014-2015. The results and actions taken since that plan are not clear.

The 2019 policy brief *“Online Child Sexual Exploitation and Abuse: Intensity of the Risks, Severity of the Consequences, and Adequate Reaction in BiH”*²⁶ concluded that children are still vulnerable to online risks in Bosnia and Herzegovina. This vulnerability is due to various factors, but the policy brief underlined the inadequate legal framework as a factor that could encourage potential perpetrators.

From the available information on current online trends and challenges faced by the public in Bosnia and Herzegovina, the reaction to the “blue whale challenge”²⁷, as in other countries in Europe, focussed the need for more online safety awareness and promotion of positive approach to digital technologies in Bosnia and Herzegovina.

In 2017, under the slogan “Surf the Internet safe and smart”²⁸, education and awareness raising activities were launched including “Stories from the Internet”, a in comic book publication aimed at children and young people. The stories presented different situations that might be encountered online. Statistics from the IFS-Emmaus helpline report that out of 660 reports received, 66 concerned intent to create child sexual abuse material.

Safer Internet Day has been celebrated in Bosnia and Herzegovina since 2011. In 2019, an online competition²⁹ was organized for elementary and high school students in the form of an online quiz with prizes.

Stakeholders ecosystem: Organisations active in child online protection

Government:

- Ministry of communications and traffic
- Ministry of Security

²⁴ www.sigurnodijete.ba

²⁵ https://ec.europa.eu/home-affairs/sites/homeaffairs/files/what-we-do/policies/organized-crime-and-human-trafficking/global-alliance-against-child-abuse/docs/reports-2014/ga_report_2014_-_bosnia-and-herzegovina_en.pdf

²⁶ Vujovic, Srdan. (2019). Online Child Sexual Exploitation and Abuse: Intensity of the Risks, Severity of the Consequences, and Adequate Reaction in BiH (Policy Brief). 10.13140/RG.2.2.22719.05280.

²⁷ <https://www.aa.com.tr/ba/nauka-i-tehnologija/plavi-kit-aktuelizirao-sigurnost-na-internetu-djeca-u-bih-se-ne-pripremaju-za-cyber-svijet/821506#>

²⁸ <https://www.klix.ba/scitech/tehnologija/cyber-sigurnost-u-bih-vise-od-600-prijava-od-cega-68-slucajeva-zlostavljanja-djece/170607050>

²⁹ <https://mtel.ba/Press-centar/a3766-Dan-sigurnijeg-interneta-2019-Zajedno-za-bolji-Internet.html>

- Regulatory agency for communication³⁰
- Ministry for human rights and refugees
- Ministry of Justice
- Ministry of security
- Federal police directorate³¹

Non-governmental organizations:

- Criminal policy research centre³²
- UNICEF BiH
- Save the Children
- International Solidarity Forum- IFS-Emmaus (Safer Internet Centre)

Educational institution:

- University of Sarajevo – Faculty for criminology and safety studies³³

Table 6: Compliance with ITU child online protection guidelines (Bosnia and Herzegovina)

Child guidelines
There is an active Safer Internet Centre in Bosnia and Herzegovina, but it has been reported that there are no active education or awareness programmes for children. Raising awareness and knowledge about possible harmful activities online, such as bullying and harassment, identity theft, and online abuse is of utmost importance for children and young people. While there is an active helpline and hotline, more awareness activities and support from stakeholders would help to raise awareness of these services among children and young people.
Parents and educator guidelines
There seems to be a lack of education programmes for teachers and parents in the field of child online protection. Educating and creating awareness campaigns for teachers, parents, and guardians is a priority. Education and training for civil servants and professionals must be a part of future activities to increase the level of competence of all professionals working with children.
Industry guidelines
There are some signs of industry involvement and support for awareness raising activities in Bosnia and Herzegovina. Representatives of operators and digital technology industries must have a larger role in child online protection in Bosnia and Herzegovina.
Policy-maker guidelines
There are some discrepancies in the legal aspect of online safety and protection of children in Bosnia and Herzegovina that need to be addressed. The legal framework forms one of the basic pillars of creating a safe and positive space for children online.

³⁰ <https://rak.ba/en/>

³¹ <http://www.fup.gov.ba/>

³² https://cprc.ba/en/o_nama.php

³³ <https://www.fkn.unsa.ba/>

4.2 Analysis

It is highly commendable that Emmaus (IFS-Emmaus) is one of the leaders of online safety in Bosnia and Herzegovina, with the coordination of a Safer Internet Centre, organization of the Safer Internet Day, and various other activities it provides.

However, there is an evident need for more varied stakeholder involvement. There are some activities supported by industry stakeholders, but Internet service providers and the digital technology industry need to be more involved in child online protection in Bosnia and Herzegovina.

The legal aspect of online safety and protection of children needs to be addressed. Government involvement in this area is evident but governmental agencies and departments could propel this topic further into the public space to help raise awareness of child online protection and safety.

Education and training for civil servants and professionals must be a part of future activities to increase the level of competence of all professionals working with children. As in most countries trying to combat the challenges in online safety, coordination and cooperation could be improved, and more actions undertaken. A multi-stakeholder approach stands up best to the challenges of child online protection in the digital world and needs coordination, management, and active participation of a wide range of stakeholders.

There are active surveys, policy drafts and some research on child online protection in Bosnia and Herzegovina. However, more focused, nation-wide, and scientifically approved research would provide a stable basis for future activities and help to understand the current digital space threats and trends facing children and youth in child online protection.

5 Montenegro

Table 7: Montenegro ICT statistics³⁴

Global Cybersecurity Index 2018 ⁸	Score 0.639	Regional rank 35	Global rank 61
Member Lanzarote convention ⁹		Member We protect model ¹⁰	
27.537 Fixed-telephone subscriptions per 100 inhabitants		180.694 Mobile-cellular subscriptions per 100 inhabitants	
25.3308 Fixed (wired)-broadband subscriptions per 100 inhabitants		73.5928 Mobile-broadband subscriptions per 100 inhabitants	
70.1237% Households with a computer		72.1777% Households with Internet access at home	
71.5173% Individuals using the Internet			

Table 8: GCI 2018 report: child online protection survey responses in Montenegro³⁵

Is there cybersecurity regulation related to child online protection?	√
Is there an established public mechanism for reporting issues associated with child online protection?	X
Do you have a national strategy for child online protection?	X

³⁴ https://www.itu.int/itu-d/apis/clients/res/pdf/country_profile/report_MNE.pdf

³⁵ https://www.itu.int/dms_pub/itu-d/opb/str/D-STR-GCI.01-2018-PDF-E.pdf

Is there a national body/agency for child online protection?	X
Are there public awareness campaigns on child online protection?	
For adults?	√
For youth?	√
For children?	√
Are there any child online protection education programmes?	
For educators?	√
For parents?	√
For children?	√
Has there been any activity by government or non-government institutions to provide knowledge and support to stakeholders on how to protect children online?	√

5.1 Observations

From the data available, it seems there is no active Safer Internet Centre in Montenegro, although a feature to report illegal content and CSAM is available on the “School portal”³⁶ website from the Ministry of Education. The organization of Safer Internet Day in Montenegro³⁷ falls under the Ministry of Public Administration. There are two governmental organizations with clear child online protection activities: Ministry of Education³⁸ and Ministry of Interior Affairs³⁹. However, interest and awareness in child online protection is low. Some activities concern cyberbullying and improving recognition of the importance of child online protection. Teachers in Montenegro have been provided with education in the form of ECDL certificate and there are digital services available for teachers and students such as eDiary.

In 2017, UNICEF Montenegro developed “Net prijatelji” (Net Friends), a mobile app aimed at fighting and prevention of online violence against children and bullying. The app is intended for children between the ages of 9 and 11.

In 2012, a survey was launched on the safety of children on the Internet by the Ministry of Information Society and Telecommunications in cooperation with the Ministry of Education. The Ministry of Education and Telenor LLC (industry stakeholder) implemented the “Connecting Generations” project to educate pupils about safe Internet use. The project was continued under the name of “Get Internet, Surf Smart” by the Ministry of Information Society and Telecommunications and Telenor as well as in cooperation with the NGO “Parents”.

Education workshops were developed for Internet safety ambassadors to educate their peers in 25 primary schools across 12 towns and cities in Montenegro.

Prima, a non-governmental organization, has been implementing a project relating to the prevention of violence on the Internet among young people through workshops with primary and secondary school pupils.

Microsoft is active in child online protection by installing Microsoft Live Family Safety programme on computers in school classrooms that allows teachers and parents to monitor the behaviour of pupils and children on the Internet.

³⁶ http://www.cirt.me/O_Nama/prijavisadrzaj

³⁷ <https://www.saferinternetday.org/web/montenegro/sid>

³⁸ <http://www.skolskiportal.edu.me/Pages/Bezbednostdjecenainternetu.aspx>

³⁹ <http://www.mup.gov.me/upravapolicije/naslovna/>

Under the “School portal”⁴⁰ website intended for the use of teachers, children, and parents, it is possible to report illegal content that might endanger children, their rights, and their health. The basic function of this reporting mechanism is to stop the spread of images depicting child sexual abuse, physical and psychological attacks on children. The website also offers child online protection related news and awareness raising materials and gives general advice.

In 2013, Save The Children published “Exploitation of children on the Internet”.⁴¹ This regional report found that reports from two Montenegro telecommunication companies made no mention of any specific child online protection. A third company reported some parental control filters for blocking access to illegal websites.

From 2015 to 2016, the UNICEF office in Montenegro, in cooperation with the Government of Montenegro, carried out a survey on 1002 children and 1002 parents entitled “Children online-opportunities, risk and safety”⁴². The survey found that 29 per cent of children reported that they have seen images on the Internet that are obviously sexual, and that online violence concerns all parents, teachers, and students amongst other interesting findings, including some legal discrepancies.

In November 2019, the national CIRT (Computer incident response team) published a handbook on the role of schools in the prevention and intervention in cases of electronic peer violence⁴³.

Stakeholders ecosystem: Organisations active in child online protection

Government:

- Ministry of Education of Montenegro
- CIRT
- Ministry of Interior Affairs
- Ministry of Information Society and Telecommunications

Non-governmental organizations:

- NGO “Djeca prije svega” (Children before everything)
- Alliance “Parents.me”
- Domen
- Digitalizuj.Me
- UNICEF Montenegro
- Prima (NGO)

Industry:

- Internet digital stakeholders (telecommunication companies)
- Microsoft

⁴⁰ <http://www.skolskiportal.edu.me/Pages/Bezbjednostdjecenainternetu.aspx>

⁴¹ <https://nwb.savethechildren.net/sites/nwb.savethechildren.net/files/library/Eksploatacija-djece-na-internetu-april-2013.pdf>

⁴² <https://www.unicef.org/montenegro/media/8846/file/MNE-media-MNEpublication323.pdf>

⁴³ <http://www.cirt.me/vijesti/214645/Prirucnik-Uloga-skole-u-prevenciji-i-intervenciji-u-slucajevima-elektronskog-vrsnjackog-nasilja.html>

Table 9: Compliance with ITU child online protection guidelines (Montenegro)

Children guidelines
There is no central body for child online protection issues nor a reporting mechanism for reporting online harms, both essential in raising awareness and educating children and young people about online harms and challenges. While there are some educational activities it would be beneficial to expand to the whole country.
Parents and educator guidelines
There are some education activities aimed at parents and educators, Montenegro could expand these to the whole country. Parent, teacher, and educator involvement is crucial in recognising the first signs of child abuse online.
Industry guidelines
While some stakeholder activities are tackling these topics, a more coordinated and managed approach with key stakeholders would yield better results. Industry stakeholders should be informed of child online protection issues to increase general levels of prevention in Montenegro.
Policy-maker guidelines
There are discrepancies in the legal aspects of child online protection that need to be addressed. The legal framework forms one of the basic pillars of creating a safe and positive space for children online.

5.2 Analysis

There seems to be diverse interest from various stakeholder groups for the topic of child online protection in Montenegro, which creates a great support structure for a more coordinated and well thought out plan of activities. Lack of coordination and management of different child online protection activities and approaches creates confusion and is not beneficial to the overall aim of protecting children online. While there seems to be a hotline reporting structure in place, creating awareness of the reporting route, as well as establishing a national Safer Internet Centre, which does not seem to exist in Montenegro, should be a matter of priority.

Awareness raising and educational activities have been undertaken in the last couple of years, but without a nationwide coverage in Montenegro. Governmental support in education of professionals working with children and especially teachers should be supported and promoted. Concerns were voiced among parents, children, and teachers about online violence, cyberbullying, and general child online protection challenges. While some activities by different stakeholders were tackling these topics, more coordinated and managed approach with a wide array of key stakeholders would yield better results in prevention and education of those groups and increase levels protection of children in Montenegro. There were also concerns about discrepancies in the legal aspects of child online protection in Montenegro. Scientific research on the current threats and trends in the behaviour of children and young people online would help national central coordination to face the current challenges in child online protection in Montenegro.

6 North Macedonia

Table 10: North Macedonia ICT statistics⁴⁴

Global Cybersecurity Index 2018 ⁸	Score 0.800	Regional rank 21	Global rank 34
Member Lanzarote convention ⁹		Member We protect model ¹⁰	
18.0244 Fixed-telephone subscriptions per 100 inhabitants		98.4558 Mobile-cellular subscriptions per 100 inhabitants	
19.9363 Fixed (wired)-broadband subscriptions per 100 inhabitants		67.4173 Mobile-broadband subscriptions per 100 inhabitants	
67.2537% Households with a computer		69.1605% Households with Internet access at home	
79.1678% Individuals using the Internet			

Table 11: GCI 2018 report: child online protection survey responses in North Macedonia⁴⁵

Is there cybersecurity regulation related to child online protection?	√
Is there an established public mechanism for reporting issues associated with child online protection?	√
Do you have a national strategy for child online protection?	X
Is there a national body/agency for child online protection?	√
Are there public awareness campaigns on child online protection?	
For adults?	√
For youth?	√
For children?	√
Are there any child online protection education programmes?	
For educators?	√
For parents?	√
For children?	√
Has there been any activity by government or non-government institutions to provide knowledge and support to stakeholders on how to protect children online?	√

6.1 Observations

While the Faculty of Computer Science and Engineering organises the national Safer Internet Day, there is no data available on a national Safer Internet Centre in the Republic of North Macedonia. On Safer Internet Day 2019,⁴⁶ panel discussions around the country took place with teachers from primary and secondary schools taking part. Discussions emphasised the importance of keeping the Internet a safe place for children. For the third year in a row, the Internet Governance Forum⁴⁷ of the

⁴⁴ https://www.itu.int/itu-d/apis/clients/res/pdf/country_profile/report_MKD.pdf

⁴⁵ https://www.itu.int/dms_pub/itu-d/opb/str/D-STR-GCI.01-2018-PDF-E.pdf

⁴⁶ <https://www.saferinternetday.org/web/north-macedonia/sid>

⁴⁷ <http://igfmkd.mk/>

Republic of North Macedonia (IGF MKD) organizes annual events addressing Internet privacy and child safety on the Internet. It has been highlighted that there is a growing need for child online protection education of parents and teachers. The “Privacy Lessons” project has been delivered in 21 schools, organised by the Data Protection Agency. The Metamorphosis Foundation is active in the field of child online protection including a guide for parents⁴⁸ published in 2015. The Foundation is also active in creating a website⁴⁹ intended to protect children's rights and privacy on the Internet. There has also been research and analysis⁵⁰ through a questionnaire for high school children in the city of Skopje.

In 2019, in cooperation with the Ministry of Information Society and Administration (MISA) and Ministry of Education, the Metamorphosis Foundation developed educational content for children, parents and teachers and organized one-day educational events of parallel workshops with all three target groups⁵¹. The workshops were attended by 97 participants in total: 60 children, 17 parents and 20 teachers. This event helped to implement an important element of the National Strategy for Cyber Security 2018-2022. In its strategy for 2019-2023, the Metamorphosis Foundation gives particular emphasis to cybersecurity as part of its Human Rights Online Programme, aiming to help communities, including young people and children.

The channels for reporting computer-related or online incidents and crimes include: (1) in every police station in person or via phone, (2) to the Department of Cybercrime and Digital Forensics Unit at the Ministry of Interior, and (3) to the Directorate of Personal Data Protection in the case of a data abuse. The Directorate website informs citizens of their rights such as making a “request for confirming violation of the right for personal data protection”.⁵² The Ministry of Interior offers phone numbers for citizens to report any computer crime directly to the Department of Cybercrime and Digital Forensics Unit and also to any police station. The ministry has set up the Red Button⁵³ service, whereby citizens can report online content related to child sexual abuse, hate speech online, and also report calls for violence. Also, there is the possibility to report online child abuse to the ministry via email.

The Government of North Macedonia is supporting a website⁵⁴ aimed at educating and promoting protection software for safe and responsible use of the Internet.

Stakeholders ecosystem: Organisations active in child online protection

Government:

- Data Protection Agency
- Ministry of Interior – Department of Cybercrime and Digital Forensics Unit
- Ministry of Information Society and Administration
- National Computer Incident Response Centre (MKD-CIRT), established as a separate organizational unit within the Agency for Electronic Communications
- Government of North Macedonia (various departments)

Non-governmental organizations:

- Metamorphosis Foundation
- Internet Hotline Provider Macedonia (IGFMKD)

⁴⁸ <https://dzlp.mk/sites/default/files/u1002/Vodic%20za%20roditeli.pdf>

⁴⁹ http://bezbednonainternat.org.mk/component/option,com_frontpage/Itemid,1/lang.mk/

⁵⁰ [Metamorphosis .org](http://Metamorphosis.org)

⁵¹ https://metamorphosis.org.mk/aktivnosti_arhiva/metamorfozis-del-od-obukata-za-sajber-bezbednost-za-uchenici-nastaven-kadar-i-roditeli/

⁵² <https://dzlp.mk/en/node/2191>

⁵³ <http://redbutton.mvr.gov.mk/prijavi.aspx>

⁵⁴ <http://surfajbezbedno.mk/>

Education institution:

- Faculty of computer science and engineering

Table 12: Compliance with ITU child online protection guidelines (North Macedonia)

Children guidelines
There are no reported educational and promotional activities aimed at children and young people in North Macedonia. These activities should be supported and promoted. Understanding the challenges and harms that children could encounter online is an essential step towards creating a safe and positive space online for children.
Parents and educator guidelines
The educational and awareness raising activities are not coordinated or guided. Understanding and coordinating various activities for education and raising awareness amongst parents and educators would increase the level of protection of children online and lead to better results from different active campaigns.
Industry guidelines
Industry stakeholders seem to be active in some areas but should take a more active part in promoting the tools and promotional activities already being carried out for the protection of children online.
Policy-maker guidelines
Development of a national child online protection strategy should be a priority for policy-makers in North Macedonia. This document presents the basis of all future short-, medium- and long-term activities in child safety and the protection of children online.

6.2 Analysis

There are some activities on the protection of children online but there needs to be a significant shift in the size and organizational capacity of activities aimed at raising awareness and education amongst children, parents and teachers. While some of the activities are aimed at raising awareness and increasing the level of knowledge this could be improved by adding more topics and increasing the number of such activities.

Internet stakeholders should take a more active part in promoting the tools and promotional activities already being carried out. Governmental support and further involvement would help, especially for the creation of a national Safer Internet Centre. A multi-stakeholder approach stands up best to the challenges of child online protection in the digital world, with stakeholders actively contributing and engaging with each other to create a more coordinated approach to the challenges of child online protection.

There are examples of single activities and projects, such as raising awareness about hate speech online or producing printed educational material. All of these activities should be commended but there is a need for a much more robust, organised and guided approach to issues and concerns of online safety in North Macedonia.

7 Serbia

Table 13: Serbia ICT statistics⁵⁵

Global Cybersecurity Index 2018 ⁸	Score 0.643	Regional rank 34	Global rank 58
Member Lanzarote convention ⁹		Member We protect model ¹⁰	
27.605 Fixed-telephone subscriptions per 100 inhabitants		97.5831 Mobile-cellular subscriptions per 100 inhabitants	
17.4377 Fixed (wired)-broadband subscriptions per 100 inhabitants		67.0245 Mobile-broadband subscriptions per 100 inhabitants	
72.0878% Households with a computer		72.906% Households with Internet access at home	

Table 14: GCI 2018 report: child online protection survey responses in (Serbia)⁵⁶

Is there cybersecurity regulation related to child online protection?	✓
Is there an established public mechanism for reporting issues associated with child online protection?	✓
Do you have a national strategy for child online protection?	✓
Is there a national body/agency for child online protection?	✓
Are there public awareness campaigns on child online protection?	
For adults?	✓
For youth?	✓
For children?	✓
Are there any child online protection education programmes?	
For educators?	✓
For parents?	✓
For children?	✓
Has there been any activity by government or non-government institutions to provide knowledge and support to stakeholders on how to protect children online?	✓

7.1 Observations

Education on Internet safety is carried out through lectures held by representatives of the National Contact Centre for Children's Safety on the Internet (hereinafter: Contact Centre) in schools for children, teachers and parents, as well as through media and digital campaigns by organizing seminars, workshops, presentations, etc. Activities are also carried out related to counselling, prevention, and reception and forwarding reports on harmful, inappropriate, and illegal content. In order to raise awareness of the dangers of the Internet, the educators of the Contact Centre make interactive presentations for children, parents, and teachers. From 2017, the Contact Centre made 377 presentations for children and parents in 133 primary schools attended by around 13 887 pupils and

⁵⁵ https://www.itu.int/itu-d/apis/clients/res/pdf/country_profile/report_MNE.pdf

⁵⁶ https://www.itu.int/dms_pub/itu-d/opb/str/D-STR-GCI.01-2018-PDF-E.pdf

4 814 parents and teachers throughout Serbia. The Contact Centre plans to continue the education in 2020. Education is aimed at parents and children.

In 2017, the Ministry of Trade, Tourism and Telecommunication established the helpline “National Contact Centre for Child Online Protection (19833)70” and an Internet portal. Both will enable reporting of harmful, illicit and illegal content and behaviour on the Internet. The ministry dispatches such reports to the appropriate recipient (website administrators for harmful content and to the competent prosecutor office), and the Ministry of Interior (Service for combating cybercrime) in cases of criminal offences.

“For the past four years, Serbia has been organizing campaigns in the field of Child Online Protection which is in line with Regulation on child safety and protection when using Information Communication Technologies (ICT). This Regulation contributes to a comprehensive approach on Child Online Protection and will develop state mechanisms of assistance and reactions in this area. Regulations have several goals including raising awareness and knowledge on the advantages and the risks of Internet use (through seminars, workshops, press releases and in cooperation with competent organizations such as civil society organizations). Secondly, they provide ways to use the Internet safely and enhance digital literacy of children, parents and teachers. Finally, regulations also aim at developing cooperation between public sector bodies in this area”⁵⁷.

The Ministry of Trade, Tourism and Telecommunications has for the past four years been implementing IT Caravan, an educational campaign to promote the useful, creative, and secure use of information technology. IT Caravan is the carrier of the platform "Smart & Safe", which presents the benefits of using the Internet and new technologies in education, business and communications, as well as the dangers of improper use. The Ministry also has a continuous media campaign for child online protection aired on Radio Television Serbia.

In September 2019, a digital guide⁵⁸ aimed at reducing online risk for four to eight year-olds was created as part of a project initiated by UNICEF and Telenor and implemented by the Ministry of Education, Science and Technological Development and the Uzicki centre for children’s rights.

In December 2019, amendments were made to the law on the initiative of Tijana Juric Foundation. Life imprisonment replaces the sentence of thirty to forty years in prison for all offences in which it has been prescribed so far, but it cannot be imposed on persons under 21 at the time they committed the crime. For life imprisonment, conditional release is possible after serving 27 years, but for the most serious crimes such as the murder of a child, a pregnant woman, or the rape of a child, conditional release is not possible.

There are several printed handbook materials on the topic of online safety in Serbia and multiple organizations provide awareness materials and run campaigns. One of the most active organizations is the Tijana Juric Foundation.

Stakeholders ecosystem: Organisations active in child online protection

Government:

- National Contact Centre for Children's Safety on the Internet, established by the Ministry, in accordance with Regulation on safety and protection of children while using ICT technologies (Official Gazette od RS, no. 30/20).⁵⁹
- Ministry of Internal Affairs
- Ministry of Education, Science and Technological Development

⁵⁷ https://www.itu.int/dms_pub/itu-d/opb/str/D-STR-GCI.01-2018-PDF-E.pdf

⁵⁸ <https://www.telenor.rs/sr/o-telenoru/o-nama/drustvena-odgovornost/telenor-fondacija/prvi-digitalni-vodic-za-bezbednost-dece-na-internetu/#>

⁵⁹ <http://www.pravno-informacioni-sistem.rs/SlGlasnikPortal/eli/rep/sgrs/vlada/uredba/2020/13/4/reg>

Non-governmental organizations:

- Save the children⁶⁰
- UNICEF⁶¹
- Tijana Jurić Foundation⁶²
- UNITAS Foundation⁶⁴
- Red Cross

Industry:

- Telenor

Table 15: Compliance with ITU child online protection guidelines (Serbia)

Children guidelines
There are various and active awareness raising and educational campaigns in Serbia aimed at children and young people, and the topic of online safety seems to be a topic of interest for both children and young people. Including more diverse topics from media literacy to digital citizenship would be beneficial as well as positive examples of digital benefits.
Parents and educator guidelines
Parents and educators seem to be highly involved with the topic of online safety and child online protection in Serbia. Educational and awareness raising activities are aimed at both parents and teachers. A centralised body to coordinate different activities and give guidance and direction to these activities would help.
Industry guidelines
There seems to be some industry activity and engagement in the area of child online protection but a much wider involvement should be supported. Industry stakeholders in Serbia need to take a more active role in engaging with the public and promoting positive principles of child online protection.
Policy-maker guidelines
Development of a national strategy for child online protection is an important first step for policy-makers in Serbia. The development of such a document should be considered a priority. Many of the positive effects of child online protection are generated through a national strategy with a clear intention to deal with child online protection issues.

7.2 Analysis

The topic of online safety is high on the agenda of both the civil society and government. The public discourse reflects the multiple challenges of online safety and protection of children, often focusing on crimes against children. Various NGOs and other organizations provide constant support and guidance on a range of topics, organising lectures, education, and conferences with the aim of educating parents and children.

Some legal aspects have changed in recent years concerning child online protection topics and more research needs to be done. While there is a hotline and a helpline active in the country, a

⁶⁰ <https://nwb.savethechildren.net>

⁶¹ <https://www.unicef.org/serbia>

⁶² <https://tjana.rs>

⁶³ <https://netpatrola.rs/>

⁶⁴ <https://www.unitas.ngo>

central awareness centre coordinating some of the various activities carried out by a broad range of stakeholders would be beneficial for the improvement of public awareness around the topic.

In regard to filtering and monitoring of Internet in schools, the Academic network of the Republic of Serbia (AMRES) blocks the following content:

- child abuse content
- filter avoidance
- gambling
- hate speech
- illegal drugs
- pornography

Investment of time and effort in the further education of professionals working with children and teachers should be made, as they are often the first people to notice or receive reports directly from children regarding online harms.

Although there is a diverse group of stakeholders involved, greater industry involvement and a more centralised coordinated effort for some of the campaigns would help as activities and topics overlap. Further development, capacity building and strengthening of the national Safer Internet Centre would help with managing and coordinating many of these points as well as starting the national scientific research that would guide some of the activities around the child online protection topic.

International cooperation is of utmost importance for anybody working in the field of child online protection, as challenges, trends and new apps are constantly being developed and popularized, which have no respect of national boundaries. Support in this regard to all stakeholder sectors would help to guide some of the issues of online harms and mitigate implementation challenges and finding the right approach to different topics.

8 Moldova

Table 16: Moldova ICT statistics ⁶⁵

Global Cybersecurity Index 2018 ⁸	Score 0.662	Regional rank 31	Global rank 53
Member Lanzarote convention ⁹		Member We protect model ¹⁰	
27.3498 Fixed-telephone subscriptions per 100 inhabitants		88.014 Mobile-cellular subscriptions per 100 inhabitants	
25.3787 Fixed (wired)-broadband subscriptions per 100 inhabitants		72.759 Mobile-broadband subscriptions per 100 inhabitants	
51.1095% Households with a computer		50.5352% Households with Internet access at home	
76.1245% Individuals using the Internet			

⁶⁵ https://www.itu.int/itu-d/apis/clients/res/pdf/country_profile/report_MNE.pdf

Table 17: GCI 2018 report: child online protection survey responses in Moldova⁶⁶

Is there cybersecurity regulation related to child online protection?	√
Is there an established public mechanism for reporting issues associated with child online protection?	√
Do you have a national strategy for child online protection?	√
Is there a national body/agency for child online protection?	X
Are there public awareness campaigns on child online protection?	
For adults?	√
For youth?	√
For children?	√
Are there any child online protection education programmes?	
For educators?	√
For parents?	√
For children?	√
Has there been any activity by government or non-government institutions to provide knowledge and support to stakeholders on how to protect children online?	√

8.1 Observations

On 19 September 2017, the Committee on the Rights of the Child⁶⁷ reported that the Republic of Moldova intended to introduce concrete programmes to fight bullying and psychological violence as part of their national strategy, including plans to set up regional rehabilitation centres for victims of violence. Awareness raising sessions and events were organized yearly to prevent violence against and among children. Various courses, programmes, and workshops were organized in cooperation with schools about online security, the helpline, and protection services.

La Strada Moldova is one of the organizations active in the area and operates to ensure the rights and legal interests of children to stay free from violence at all levels – individual, legislative and executive. They do so by strengthening communities, developing policies, and applying a comprehensive change model to their work, through information and education, providing direct support and assistance to children who have suffered from online sexual exploitation or sexual abuse. La Strada is also the Safer Internet Day organiser in Moldova.

La Strada 2019 SID campaign aimed to raise awareness about the ‘sextortion’ issue– one of the risks youngsters are exposed to while sending intimate photos or videos online.

Established in 2001, the Child Mobile Team runs the *Issues Affecting Children Program* at La Strada. The team consists of an attorney and several psychologists and provides assistance during criminal proceedings to child victims and witnesses of sexual abuse and sexual exploitation. In order to raise awareness of youngsters and the general public, La Strada launched a video⁶⁸ inspired by Child Mobile

⁶⁶ https://www.itu.int/dms_pub/itu-d/opb/str/D-STR-GCI.01-2018-PDF-E.pdf

⁶⁷ <https://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=22104&LangID=E>

⁶⁸ https://www.youtube.com/watch?time_continue=3&v=FpSPll_NfDc

Team⁶⁹ assisted cases. Victims are encouraged to report cases via the safe reporting mechanism on a specialised safety online platform managed by La Strada⁷⁰.

The Guide for Parents⁷¹ was developed and presented during a workshop that aimed to empower parents to better understand their child's behaviour on social networks and encourage them to support their child's safe experience online.

On the Safer Internet Day 2019, La Strada launched a contest for teachers⁷² to encourage them to conduct creative activities with children and young people about safety online. During the whole month, teachers conducted informational activities for more than 2 000 children from 17 schools from around the country. In 2017, La Strada also published the National Study on Children's Behaviour⁷³ online.

The "Intersection"⁷⁴ programme, implemented by the La Strada, created the community of teachers in child online protection, with representatives of more than 60 educational institutions throughout the Republic of Moldova. With the support of community teachers in 2019, activities were carried out for more than 2 000 children and adolescents across the country.

Law 30/2013 on the protection of children against the negative impact of information provides the types of information accessible to the public that are considered to have a negative impact on children. The dissemination of this type of information is prohibited or limited under the conditions of the law. Thus, through this law, the government sets out a series of obligations for the media, audio-visual agents, and Internet service providers, in order to reduce the risks of exposing children to harmful content. In this way, Internet service providers should provide end users with the ability to install applications that filter content on the Internet with a negative impact on children and must include in the main menu of the official pages a section dedicated to information on Internet security.

In 2017, the Government of Moldova approved an Action Plan on the promotion of the Internet safety for children and teenagers for 2017-2020.⁷⁵ The document approaches the online risks children and teenagers are exposed to and set out actions to combat them. Several assessments have been carried out related to the behaviour of children and teenagers on the Internet, and it has been reported that hotline and helpline mechanisms will be created.

In 2018, the Government of Moldova published new measures⁷⁶ to enhance children's online safety such as to require Internet service providers to give end users the possibility to install content filtering applications, and to create awareness sections on their websites. According to a study conducted by the SocioPolis Research and Advice Centre, "The main issues in online space are breakdown of social networking accounts – every fifth child between 12 – 15 has collided with such cases, blocking groups' social networks – 18.6 percent of children, involuntary access to or view sexual images – 16.3 percent of children. Among risky actions of teenagers on the Internet is that one – a third of children are looking for friends online. Thirty per cent shop in virtual stores and 13 per cent buy online games. Many children do not know about the risks in virtual space. "

In 2019, IREX Europe organised Multimedia Connector for Youth⁷⁷. This was a combination of exercises and presentations, workshops and projections on civic activism and citizen journalism, media education and online safety for 160 young people from across Moldova.

⁶⁹ http://lastrada.md/pic/uploaded/EAC_factsheet_ENG%202018.pdf

⁷⁰ www.siguronline.md

⁷¹ <https://www.coe.int/web/children/lanzarote-convention>

⁷² http://lastrada.md/rom/articole/comunitatea-nationala-a-pedagogilor-pentru-siguranta-copiilor-in-mediul-online-cre-180?fbclid=IwAR35j7uaK_erloecqbTT2NohiT-4-h6bVgMGQQ65UA426x_Uwv9MfbHpNfk

⁷³ http://lastrada.md/files/resources/3/Child_Safety_online_ENG.pdf

⁷⁴ http://www.childpact.org/wp-content/uploads/2019/10/MD_INSPIRE_Mapping_Country_Factsheet.pdf

⁷⁵ <https://gov.md/en/content/cabinet-approves-action-plan-promoting-internet-safety-children-and-teenagers>

⁷⁶ <https://gov.md/en/content/cabinet-approves-new-measures-enhance-childrens-online-safety>

⁷⁷ <https://irex-europe.fr/2019/09/10/connecting-youth-and-media-in-moldova/>

The Government of Moldova published the “National level review on the fulfilment of commitments taken under the Beijing declaration and platform for action”⁷⁸ detailing various activities to be carried out including raising awareness, implementing a free hotline for children, organization of events, and developing national campaigns.

Stakeholders ecosystem: Organisations active in child online protection

Government:

- Ministry of Economy and Infrastructure
- Ministry of Education, Culture and Research
- Ministry of Internal Affairs
- General Prosecutors Office
- Information Technology and Cyber Security Service
- Centre for Combating Cybercrimes at the General Inspectorate of Police
- Ministry of Health, Labour and Social Protection
- Ombudsman for Children's Rights
- State Agency for the Protection of Morality
- National Regulatory Agency for Electronic Communications and Information Technology
- Municipal Directorate for the Protection of the Rights of the Child

Non-governmental organizations:

- La Strada
- National Centre for Child Abuse Prevention
- National Centre for Training, Assistance, Advice and Education in Moldova "CNFACEM"
- UNICEF

Table 18: Compliance with ITU child online protection guidelines (Moldova)

Children guidelines
The awareness raising and educational campaigns, events, and activities in Moldova aimed at children and young people should have a broader reach and greater frequency. More diverse topics from media literacy to digital citizenship, as well as positive examples of digital benefits, would be beneficial.
Parents and educator guidelines
A centralised body to coordinate different activities and give guidance and direction to these activities is advisable, and the creation of such a body would enhance existing and create new opportunities for education for parents and educators.
Industry guidelines
Industry involvement in the child online protection practice and awareness raising should be encouraged as the multi-stakeholder approach has been identified as the most beneficial to the advancement of child online protection.
Policy-maker guidelines
There are commendable activities by government and policy makers in creation of action plans and strategies, and the establishment of the National Safer Internet Centre should be encouraged with a wide stakeholder representation.

⁷⁸ https://www.unecce.org/fileadmin/DAM/Gender/Beijing_20/Moldova.pdf

8.2 Analysis

There is an obvious civil society involvement in child online protection in the Republic of Moldova, and while there are great efforts by La Strada, a more diverse stakeholder approach should be cultivated. The action plans for 2017-2020 is a great example of the first step for a greater government involvement in this topic. While all of these actions are important, there is room for improvement by creating a beneficial space for innovation and exploration of new topics and trends in online safety for children and youth of the Republic of Moldova.

Focusing on the scientific research to form the basis of future activities and guide some of the decisions with the correct set of data from a nationally representative source is highly important. The creation of a National Safer Internet Centre would encompass much of these topics and give a platform for many other organizations to come forward and take an active part in the creation of a safer Internet for children in Moldova.

Awareness raising activities are being carried out, but more focus should be put on the topic of digital media literacy and education of professionals working with children, especially teachers. While there are requirements for telecommunication operators to give end users the possibility to filter some content to their users, the question remains if school Internet connections are in any way monitored or filtered.

9 Ukraine

Table 19: Ukraine ICT statistics (Latest data available: 2018)⁷⁹

Global Cybersecurity Index 2018 ⁸	Score 0.661	Regional rank 32	Global rank 54
Member Lanzarote convention ⁹		Member We protect model ¹⁰	
13.8022 Fixed-telephone subscriptions per 100 inhabitants		122.551 Mobile-cellular subscriptions per 100 inhabitants	
12.2818 Fixed (wired)-broadband subscriptions per 100 inhabitants		45.235 Mobile-broadband subscriptions per 100 inhabitants	
62.0113% Households with a computer		60.2638% Households with Internet access at home	
58.8895% Individuals using the Internet			

Table 20: GCI 2018 report: child online protection survey responses in Ukraine⁸⁰

Is there cybersecurity regulation related to child online protection?	√
Is there an established public mechanism for reporting issues associated with child online protection?	√
Do you have a national strategy for child online protection?	√
Is there a national body/agency for child online protection?	√
Are there public awareness campaigns on child online protection?	
For adults?	X

⁷⁹ https://www.itu.int/itu-d/apis/clients/res/pdf/country_profile/report_MNE.pdf

⁸⁰ www.itu.int/dms_pub/itu-d/opb/str/D-STR-GCI.01-2018-PDF-E.pdf

For youth?	X
For children?	X
Are there any child online protection education programmes?	
For educators?	√
For parents?	√
For children?	X
Has there been any activity by government or non-government institutions to provide knowledge and support to stakeholders on how to protect children online?	√

9.1 Observations

The coverage of legislation with respect to Child Sexual Abuse Material (CSAM) is an issue. The legislation refers to the offence of distribution of CSAM; it is not an offence to download, view and store CSAM. This is proving a significant issue for law enforcement in bringing offenders to justice. Currently the legislation does not include any offence of ‘grooming’ a child. Possession of child pornography is not a crime.

The general level of awareness of online risks and threats is low, particularly amongst parents.

There is an appetite and willingness from stakeholders to participate and collaborate on online child protection, albeit in isolation as there is a lack of national coordination, and there appears to be little collaboration between government and non-governmental organizations.

The quality of initial teacher training was raised as an issue and its suitability to adequately prepare teachers to teach children about digital skills and competencies. Capacity and capabilities of teachers in Ukraine to deliver child online protection topics in the classroom needs more encouragement and structure.

There are existing measures in place to prevent offenders convicted of child abuse crimes from taking a position as a social worker, adopted parents, police officers, or a role in public office.

Whilst there are plans to extend the national telephone helpline for children, it currently lacks resources and capacity, meaning it has limited availability for children seeking help. The spread of fake news, and fear mongering amongst parental chat groups on online platforms (messaging and social networks) seems to be one of the issues in the online space of Ukraine.⁸¹

Stakeholders ecosystem: Organisations active in child online protection

Government:

- Deputy Prime minister
- Ministry of digital transformation
- Commissioner for Children with the President of Ukraine
- Ministry of Internal Affairs of Ukraine
- Ministry of Justice of Ukraine
- Centre for Public Health of the Ministry of Health of Ukraine
- Human Rights Ombudsman of Ukraine

⁸¹ Observations about the status of COP in Ukraine have been made through the ITU assessment and report prepared by Mr David Wright and Mr Boris Radanović.

- Embassy of Great Britain in Ukraine
- Institute of education content modernization
- Ukrainian Centre for Education Quality Assessment
- State Service of Education Quality of Ukraine
- National Commission for the state regulation of communications and informatisation
- Ministry of Social Policy of Ukraine
- Ministry of Education and Science of Ukraine
- Department of Juvenile Prevention of the National Police of Ukraine
- Ministry of culture, sport and youth of Ukraine
- Cyberpolice Department of the National Police of Ukraine
- Ukrainian Institute for Education Development
- Educational Ombudsman of Ukraine

Industry:

- Datagroup
- VegaTelecom
- Vodafone
- Ukrtelecom
- EPAM
- Cisco
- Microsoft
- Kyivstar
- Lifecell
- Kidslox

Educational institutions:

- National Academy of Internal Affairs of Ukraine
- Institute of Social and Political Psychology of NAPS of Ukraine
- Academy of Cybersecurity of Ukraine

Non-governmental organizations:

- La Strada Ukraine
- Women Consortium of Ukraine
- A21 Ukraine
- IREX
- UNICEF
- OSCE Ukraine
- Epicentre K
- Ukrainian Group of Information Security
- Internet Association of Ukraine
- The O.S. Popov Odessa National Academy of Telecommunications

- Legal Association Novikov and Partners
- “Volunteer” centre
- City Child Centre
- Liko-School
- Children Analytical Psychologists’ Association

Table 21: Compliance with ITU child online protection guidelines (Ukraine)

Children guidelines
More awareness raising and educational campaigns are needed for children and young people to provide information about harms and benefits of the Internet. While there are certain local activities limited to regions or specific schools, a more nationwide approach is advisable for education and training.
Parents and educator guidelines
Child online protection awareness raising for parents and guardians as well as all professionals working with children should be created and launched, and the plans to create educational campaigns for teachers and parents should be supported further. There seems to be a low level of awareness amongst parents and guardians of general online harms that children are facing in Ukraine.
Industry guidelines
A positive interest by Industry representatives is apparent but their activities and a stronger involvement should be encouraged and coordinated. A centralised National Safer Internet Centre could be the solution to this. A gap is presented in telecommunication and mobile operator understanding of blocking, filtering, and parental controls. International case studies, cooperation and education should be encouraged on this topic.
Policy-maker guidelines
There are some discrepancies in Ukrainian law regarding CSAM and online harms and changing or amending the law should be one of the first priorities of policy-makers. There are commendable activities by the government and policy-makers in creation of action plans and strategies, and the establishment of the national Safer Internet Centre should be encouraged with a wide stakeholder representation.

9.2 Analysis

The current state of online safety in Ukraine is changing but there seems to be room for further improvement. Child sexual abuse material is not considered illegal to download, store, or make; it is illegal only to distribute. There seems to be a “Bullying law” in Ukraine but certain limitations need to be addressed. There seems to be no coordinated and overarching body or organization to guide and direct some of the activities that are already in place in Ukraine.

While it is of utmost priority to amend the laws concerning CSAM by making it illegal in all categories, it is also important that the general public, parents, teachers, children and young people understand the laws in place.

Awareness campaigns to inform the population and generate a wider understanding of such laws would be welcome. There is a need for a reporting mechanism to report CSAM. In order to delve deeper into the topic of online safety, abuse and other online challenges appropriate scientific research is needed.

Publicly available Wi-Fi including in schools and libraries seems not to be filtered or have monitored access. It would be beneficial to see easy to use and user centric parental controls in place from Internet service providers, due to the fact that the large number of parents surveyed would want to use the tools for parental controls but do not know how.

While educating parents about the use of parental controls is a worthwhile effort, education should reach much wider. Teachers and professionals working with children need support, they are often the first to see the effects and warning signs of child abuse or online harms. In the fast-paced child online protection environment, it is important to have a central education point for teachers where they could share their experiences and receive verified information on new trends in online safety and protection.

There is a diverse group of organizations, NGOs, as well as industry and ministries involved in child online protection in the Ukraine but it seems that cooperation and coordination amongst the stakeholders is an issue. Establishment of a central body, or council, to guide some of the actions and strategies would be helpful to further all the efforts already being made in the field of online safety.

Work in child online protection cannot be carried out in isolation. Organisations and institutions need to realise that they have a chance of mitigating the challenges and harms of the digital world on children only by working together. In that regard, international cooperation and connection with experienced and supportive organizations should be one of the pillars that supports effective online protection for children and young people. While sharing experience and learning from international partners and organizations, the local and regional differences must be taken into account in every step of child online protection.

Scientific, nationally representative research should be carried out to explore and better understand some of the global topics of concern in child online protection to help guide the activities and efforts towards the challenges of importance to Ukraine.

10 Georgia

Table 22: Georgia ICT statistics (Latest data available: 2018)⁸²

Global Cybersecurity Index 2018 ⁸	Score 0.857	Regional rank 9	Global rank 18
Member Lanzarote convention ⁹		Member We protect model ¹⁰	
14.5077	Fixed-telephone subscriptions per 100 inhabitants	133.398	Mobile-cellular subscriptions per 100 inhabitants
20.9996	Fixed (wired)-broadband subscriptions per 100 inhabitants	45.2633	Mobile-broadband subscriptions per 100 inhabitants
62.1134%	Households with a computer	69.523%	Households with Internet access at home
63.9686%	Individuals using the Internet		

Table 23: GCI 2018 report: child online protection survey responses in Georgia⁸³

Is there cybersecurity regulation related to child online protection?	√
Is there an established public mechanism for reporting issues associated with child online protection?	√
Do you have a national strategy for child online protection?	√
Is there a national body/agency for child online protection?	√

⁸² https://www.itu.int/itu-d/apis/clients/res/pdf/country_profile/report_MNE.pdf

⁸³ https://www.itu.int/dms_pub/itu-d/opb/str/D-STR-GCI.01-2018-PDF-E.pdf

Are there public awareness campaigns on child online protection?	
For adults?	✓
For youth?	✓
For children?	✓
Are there any child online protection education programmes?	
For educators?	✓
For parents?	✓
For children?	✓
Has there been any activity by government or non-government institutions to provide knowledge and support to stakeholders on how to protect children online?	✓

10.1 Observations

Preparatory desktop research and a series of online surveys were carried out in Georgia as a part of ITU support conducted by SWGfL from September to December 2018. The feedback from the surveys and interviews identified the main challenges⁸⁴:

- Low public awareness of online risks, harms, and global online threats.
- Teachers and professionals working with children and parents have little support when dealing with child online safety issues.
- Online bullying presents a significant challenge. There are isolated responses to this harmful behaviour but no common understanding of the issue.
- The scope and availability of illegal child abuse content online should be thoroughly researched and actions to prevent access should be undertaken.

Despite these challenges, Georgia is implementing constructive activities in the area of child online protection however they lack coherence and coordination. Children in Georgia remain a significant part of the Internet user base and benefit from online services and technology⁸⁵.

Legislation with regards to online bullying is weak, although there is work already underway to introduce new laws covering harassment. A common understanding and definition of bullying is needed.

According to the European Union General Data Protection Regulation 2016/679 (GDPR), children merit specific protection with regard to their personal data, as they may be less aware of the risks, consequences and safeguards and their rights in relation to the processing of personal data. Article 8 of the GDPR concerning the conditions applicable to child consent in relation to information society services is highly relevant to the situation in Georgia. Further alignment with the GDPR is anticipated in the future.

There is strong support from stakeholders to participate and collaborate on the field of child online protection, although there is a lack of national coordination to harmonise efforts and repeat positive activities.

⁸⁴ Observations about the status of COP in Georgia have been made through the ITU assessment and report prepared by Mr David Wright and Mr Boris Radanović.

⁸⁵ <http://eprints.lse.ac.uk/45490/1/EU%20Kids%20Online%20final%20report%202011%28Isero%29.pdf> EU Kids Online 2011.

Schools are also struggling to keep up with child protection issues. Teachers in Georgia have a wide variety of responsibilities and need support and guidance to cover child online protection issues. Programmes for further education of professionals working with children in the field of child online protection is also needed. Provision of child online protection in schools across the country could be improved.

School Internet connectivity appears to be filtered and blocks access to specific undesired content. This filtering is universal with no regard to age.

There is no common understanding of what constitutes suitable and effective online child protection provision for schools. Whilst there are many child online protection tools and resources produced across the world, there is a significant need for these to be adapted and translated for use in Georgia.

Stakeholders ecosystem: Organisations active in child online protection

Government:

- Ministry of education
- Ministry of Justice
- Georgian National Communications Commission
- Ministry of Internal Affairs
- Office of the Personal Data Protection Inspector
- Ministry of Economy and Sustainable development

Non-governmental organizations:

- Transparency International Georgia
- ISOC Georgia
- Geo IGF
- Georgian Suicide Prevention Association
- Telecom Operators Association (TOA)

Industry:

- Caucasus Online
- Magticom
- SilkNet/Geocell
- New Net
- Systemnet

Table 24: Compliance with ITU child online protection guidelines (Georgia)

Children guidelines
Education about digital literacy, fake news and media literacy should be incorporated more into awareness raising and educational activities. Online bullying seems to be a significant challenge in Georgia, with no common understanding nor coherent response to online bullying.
Parents and educator guidelines
Low public awareness of online risks and harms with an apparent need for further raising the public awareness and increasing the level of education of the online harms and dangers as well as the benefits and opportunities.
Industry guidelines
A positive interest by industry representatives is apparent but their activities and a stronger involvement should be encouraged and coordinated. A centralised national Safer Internet Centre could be the solution to this. A gap is presented in telecommunication and mobile operator understanding of blocking, filtering and parental controls. International case studies, cooperation and education should be encouraged in this topic.
Policy-maker guidelines
There is an obvious governmental support to the field of child online protection in Georgia, and the interest from various stakeholders seems to create a great starting point for all of the stakeholders to be actively involved in creating a safer Internet for children in Georgia. Some information is lacking around the availability of illegal child abuse content in Georgia and this topic needs to be thoroughly researched, understood and actions need to be taken that access is prevented to such content.

10.2 Analysis

There is obvious governmental support addressing child online protection in Georgia, and the interest from various stakeholders seems to create a great starting point for all stakeholders to be actively involved in creating a safer Internet for children in Georgia, adding to the fact that Georgia is in the top six countries regarding cyber safety.

Unfortunately, it seems there is a low public awareness of online risks and harm with an apparent need for further raising public awareness and increasing the level of education of the public on global online threats and opportunities. At the same time, education and awareness is a great tool to combat the proliferation of fake news, or false stories that create unnecessary panic amongst parents and children. Digital media literacy would be a great topic to explore and create more awareness materials and educational resources.

One of the most prominent fake news stories that caused recent concern in Georgia was in relation to the so called “blue whale challenge”. Most of the stakeholders have raised questions about this issue. Many media outlets around the world reported on the phenomenon blamed for teenager deaths in Russia without research and consultation, and it turned out to be an example of fake news.⁸⁶ The Internet is constantly changing, new issues and online platforms are rising all the time. Parents and caregivers must have open and honest conversations with their children to find out what they are seeing online, talk through some of the issues that this fake news item has brought to light, such as self-harm and negative influences online.

⁸⁶ Snopes, an online fact checking website, have found that although there have been reports of young people committing suicide in Russia, of these reported cases none have been found to have had a conclusive tie to the 'blue whale challenge'.

Specialists and professionals need proper levels of support to understand and recognize the first signs of online threats or consequences they might have on children. Teachers are often best placed to be the voice of advice for children and need to have regular training so they can continue to stay prepared for new threats and trends. As online bullying seems to be a significant challenge in Georgia, unfortunately there does not seem to be a common understanding or a coherent response to online bullying.

There seems to be some information lacking around the availability of illegal child abuse content in Georgia and this topic needs to be thoroughly researched, understood and actions preventing access to such content need to be taken.

The topics of online bullying and the availability of CSAM require more current and nationally representative research. Understanding these issues will help guide decision making among stakeholders while offering greater insight into the digital behaviour of children and young people.

11 Conclusion

Following the preparatory desktop research, contacts with stakeholders, and analysis of available resources, areas of improvement in all countries have been identified. The creation, development, and implementation of national child online protection strategies and activities is a required process and exercise in all countries mapped. This report is intended to initiate reflection that will lead to the improvement of child online protection in each country. Stakeholder engagement is needed for far reaching coverage and impact. Wider groups of stakeholders should consist of as many different key entities as possible to ensure a broad approach to child online protection. A top priority for some countries should be the amendment of aspects of child online protection legislation, especially CSAM, while for others a more comprehensive review of such laws is advisable. Technology plays a crucial role in child online protection and industry representatives should be involved in the development of better child online protection principles and policies. All activities, approaches and strategies mentioned in this report will lead to a better understanding and guidance in the field of child online protection. National awareness raising campaigns focused on education and prevention are essential to educate the general public on the challenges of child online protection.

Table 25: Key partnerships with associations, organizations, and conventions on child online protection

	Albania	Bosnia and Herzegovina	Montenegro	North Macedonia	Serbia	Moldova	Ukraine	Georgia
Lanzarote Convention	√	√	√	√	√	√	√	√
Signed We Protect	√	√	√	√	√	√	√	√
Number of active organizations	7	11	12	4	7	4	44	16
National strategy for child online protection	√	X	X	X	√	√	√	√

Status of national child online protection ecosystems in South Eastern Europe

	Albania	Bosnia and Herzegovina	Montenegro	North Macedonia	Serbia	Moldova	Ukraine	Georgia
Cyber-security regulation for child online protection	√	X	√	√	√	√	√	√
National child online protection agency	√	X	X	√	√	X	√	√

Annex 1: Questionnaire on the state of play of child online safety

Under the supervision of the ITU Regional Office for Europe, ITU is developing a report on child online protection ecosystem focusing on the state of play in terms of governance and stakeholder mapping in the following countries: Albania, Bosnia and Herzegovina, Georgia, Moldova, North Macedonia, Serbia, and Ukraine.

Please give your honest opinion and provide references in the form of URLs or upload relevant documents to the email [enquiries@swgfl.org.uk] with the subject line: [NAME OF THE COUNTRY], [ENGLISH TITLE OF THE DOCUMENT].

Thank you!

- 1 Which country are you from?
 - Albania
 - Bosnia and Herzegovina
 - Georgia
 - Moldova
 - Montenegro
 - North Macedonia
 - Serbia
 - Ukraine
- 2 What organization do you represent?
 - Governmental organization
 - NGO or a charity
 - School or educational institution
 - Industry- IT, telecommunication or media
 - Parent
- 3 Is there a Safer Internet Day celebration/organization in your country?
 - Yes
 - No
 - I don't know
- 4 It is illegal to (mark ALL that apply) Child sexual abuse material in my country
(check all that apply)
 - Possess and store
 - Distribute/upload/share
 - Make/Create
 - I am not sure
- 5 Please list the most relevant organizations in your country dealing with child online safety with a link to their official website or material on Online Safety.

- 6 Is there a Hotline in your country for reporting Child Sexual Abuse Material?
- Yes
 - No
 - Not sure
- 7 In your opinion how big is the focus on child online protection issues in your country?
- No priority 1 2 3 4 5 High priority**
- 8 What are the main 3 challenges regarding online safety in your country?
- 9 What are quick solutions that could be envisaged?
- 10 Any other comments you would like to add

Annex 2: List of sources

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