



children's charities' coalition on internet safety

The Rt Hon Patrick McLoughlin MP
Secretary of State for Transport
Great Minster House
33, Horseferry Road
London SW1P 4DR

24th May, 2013.

Dear Mr McLoughlin,

Transport providers' responsibility to create a "family friendly" transport environment

You will be aware that many businesses and other organizations are providing their customers with free access to the internet, or access at minimal cost, via WiFi. The businesses and other organizations doing this typically see it as a potential source of extra revenues or as a way of promoting themselves or both.

To the extent that this development is making the internet more widely available the children's organizations very much welcome it. However, where WiFi is being made available in a public space i.e. in a space where children and young people are likely to be found on a regular basis, as would be the case with all or almost all transport scenarios, the transport companies need to be mindful of their responsibilities.

Today we live in a world where WiFi enabled smartphones, portable games consoles, laptops, iPads and the like are widely owned and used by children and young people on the move. In these circumstances they might often be outwith the possibility of parental control or supervision of their internet usage. Two issues therefore arise: what types of materials or sites could children themselves access, whether accidentally or deliberately, whilst on a train, coach or bus, and what might other, thoughtless or inconsiderate people be able to access in situations where children and young people sitting nearby cannot avoid seeing or hearing it? Thus:

1. I am pretty sure the terms and conditions attaching to a passenger's use of any transport service will have a general clause of some kind imposing an obligation not to behave in a way which other passengers might find upsetting or would be inappropriate in a public space. However, in the internet age, if any companies haven't already done so, perhaps there is now a case for asking them to add an extra phrase or two which unambiguously state that passengers may not use any electronic or other devices to display images or broadcast sounds obtained from whatever source if they are obscene or pornographic in nature or which might reasonably be expected to upset other passengers in the vicinity, including children and young people.

-
2. In addition, the transport companies should insist the WiFi providers they use must install and operate filters which will restrict access to child abuse images (child pornography) and adult content. This would help reinforce and underline the position outlined in 1.

Many High Street retailers and several transport providers already do the above but there is a suggestion (see attached letter at paragraph 4) that, at least in relation to adult content, this is not yet universal practice. Some transport companies and WiFi providers see filtering as an option. That is completely unacceptable. Moreover there is something more than a little repulsive about the idea of one company saying to another, in effect, *"It's up to you whether or not you want to keep porn away from kids but if you do it will be more expensive."* I appreciate that filtering costs money so someone has to pay somewhere but if an industry standard is adopted wherein filtering is integrated into every offering no one can gain a competitive advantage by providing a less safe offering.

Several WiFi providers do supply filtering as a standard part of their basic package for companies wishing to provide internet access to customers in public spaces but as the attached letter makes plain that does not apply to all of them. It should. Incidentally, as of now, Nomad is by no means the only company that appears to want to levy a charge for filtering. However, they are the only company I know of that appears to be content to allow their letter to be in the public domain.

David Cameron has [spoken](#) in forthright terms about WiFi in public places but his focus hitherto has been largely on High Street retailers. I am not aware of any Government statement which refers specifically to transport providers in this context yet the challenges are essentially the same. It might therefore be helpful if you could make clear what the Government's attitude is towards this aspect of policy.

Yours sincerely,



John Carr OBE
Secretary
Children's Charities' Coalition on Internet Safety
10, Great Queen Street
London WC2B 5DD

john.carr49@btinternet.com
www.chis.org.uk

PS Because Claire Perry MP and Ed Vaizey MP have a major interest in this matter I have forwarded a copy of this letter to them and it will also shortly appear on our web site.

John Carr OBE
Secretary
Children's Charities Coalition on Internet Safety
10 Great Queen Street
London WC2B 5DD

22nd April 2013

Dear Mr Carr

RE: THE PROVISION OF WiFi IN PUBLIC SPACES

Thank you for your letter dated 28th March 2013 highlighting the issues related to the access to pornography and inappropriate content at public WiFi hotspots.

We are very familiar with the issues you raise and already participate in the work the UKCCIS is undertaking. You can rest assured that Nomad Digital supports the objective of making access to WiFi hotspots a safe and friendly place for users of all ages.

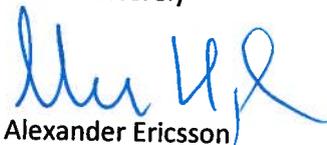
Nomad Digital operates as a white label provider to public transport (primarily train) operators globally. It therefore operates WiFi hotspots on public transport vehicles under the brand of the operator and designs and implements the service according to the requirements and budgets set by these operators.

Nomad Digital is able to filter or block inappropriate content to customers at the transport operator's request and already does so for many operators globally. However there is usually a cost implication to the transport operator. The list of inappropriate sites are supplied commercially on a subscription fee basis and some WiFi hotspots do not use the required platform (to save costs) to apply these filters. To date, for those instances where filters have not yet been applied, the decision not to apply them has been due to insufficient budgets within the transport operators business. We do believe that in time they will see sense and will request the changes. If funding was available to assist the transport operators' decision, it would certainly accelerate the implementation. If mandated, then funds would have to be found by the operators.

Until this happens, we will continue to press the transport operators to authorise the required changes, but it is currently a slow process.

If you have any further questions please do not hesitate to contact us.

Yours sincerely



Alexander Ericsson
CEO
Nomad Digital Ltd