



Children's Charities' Coalition on Internet Safety

Vernon Coaker MP
Under Secretary of State
The Home Office
Marsham Street
London SW1P 4DF

16th July, 2008.

Dear Vernon,

At Prime Minister's Questions on 2nd July Margaret Moran MP asked about aspects of Government policy in relation to blocking access to web sites containing child sex abuse images. You will see from the Prime Minister's reply to Ms Moran that he has agreed to meet with her and the children's charities to discuss the matter further. As the Minister with lead responsibility I assume you will be present at the meeting so, in this letter, I thought it might be helpful if I set out the substance of what the children's charities intend to say.

You are aware that, for some time, the Internet Watch Foundation has maintained a list of all known web sites containing child sex abuse images. Back in 2004 BT decided to take the IWF list and deploy it across their retail network as part of their "Cleanfeed" system. It means all BT's domestic customers who try to reach any of the listed sites simply have their access barred. This initiative by BT was entirely voluntary, and it was a world first. Vodafone was quick to follow suit. Most large consumer facing Internet Service Providers and all of the mobile phone companies also soon started doing it. Gratifyingly, it is a policy now being emulated in many other countries in all parts of the world.

In a letter to Margaret Moran of 11th May, 2006, you spoke of your desire to see deployment of the IWF list by 100% of consumer facing ISPs in the UK. You said you would review the situation on 31st December, 2007, adding that if by then

"... it appears to me we are not going to meet (the target of 100% coverage) through co-operation, we will review the options for imposing this on any elements of the industry that are not facing up to their responsibilities..."

More recently, answering a PQ on 16th June, you indicated that “95% of consumer broadband connections are now covered by blocking based on the IWF’s list”.

We would be grateful if you could tell us the basis on which the figure of 95% has been calculated. Has it been independently verified, if so by whom and how?

You were right to indicate in your letter of 2006 that coverage needs to be 100%. “95% of consumer broadband connections” means in fact that around 600,000 households in the UK can still access known child sex abuse web sites via broadband. That is completely unacceptable. We really would therefore like to press you to say when you intend to complete your review of “*other options*” to get us closer to 100%. We are already in the second half of 2008, a long way from 31st December, 2007.

We understand there have been objections from a number of smaller consumer ISPs about the cost of having to implement such a blocking solution. However much sympathy we might have for their economic plight, we simply reject the notion that blocking access to child sex abuse images is an optional extra, something you do as and when you can afford it. Blocking access to these images has to be seen as being part of the basic cost of doing business. That said, cost may anyway soon disappear, or at any rate recede, as an issue. Alternative technical approaches are becoming available which work above the level of the individual ISP. These alternative approaches could also help bring on board the remaining business to business (B2B) ISPs in the UK that still do not deploy the IWF list.

A number of B2B ISPs claim that the blocking policy does not and should not apply to them. They say it was only ever intended to cover the consumer market. This is not a view we share. They should be expected to comply, in exactly the same way.

We accept that with the way the technology has moved on some definitional issues arise as to what, exactly, now constitutes a “B2B” ISP. For these purposes a B2B ISP is one that markets and promotes itself solely to companies or organizations and is not active in and does not seek customers in the consumer space.

However, all of the B2B ISPs we know of provide the ability for companies or other organizations using their services to allow their employees to connect to the internet remotely. Where such remote access is allowed then, whatever the company’s or organization’s formal policy position might be, it is very likely that other household members, including children, will use the connection. This simply underlines the importance of the blocking policy being taken up comprehensively otherwise we know any holes there might be will be exploited. Thus our view is that the IWF list should be deployed at network level at or above the lowest point in the supply chain where, downstream of there, it is known that internet access will be made available in what are essentially consumer environments e.g. in employees’ homes or on the road.

Many of the B2B ISPs and smaller consumer ISPs obtain their bandwidth through BT in its capacity as a bandwidth wholesaler. BT has recently confirmed to us they now apply Cleanfeed across their entire platform: wholesale and retail, and at no extra cost. This means that all B2B ISPs and consumer ISPs obtaining their bandwidth

through BT are now covered anyway, unless they specifically opt out. We are not aware of any that have chosen to opt out.

The number of companies in the UK wholesaling bandwidth for broadband access is comparatively small. BT is believed to be the largest of them. If the other wholesalers did what BT does then the problem would be solved across the piece, without having to engage with the individual consumer ISPs or B2B ISPs. Have there been any discussions with these companies to progress this?

In that regard, we are aware that the Government itself, and the rest of the public service, are major purchasers of internet connectivity. It would clearly be inconsistent for the Government, on the one hand, to urge ISPs to filter out child sex abuse images, if it did not also, on the other, require the same standard to apply to companies involved in provisioning its own operations. Can you confirm that, if you are not already doing it, you will make clear to all potential suppliers of internet services to central Government that they must deploy the IWF list at network level or else become ineligible to continue as a supplier or contractor? Perhaps you could also indicate if there have been any other discussions along these lines with other parts of the public sector?

I am sure you will agree that we need to draw a line under this issue. It has been dragging on for far too long. The evidence is now mounting that, as the web is becoming generally a more hostile environment for purveyors and distributors of child sex abuse images, we need to start to focus our attention on a resurgent Usenet and above all on peer-to-peer networks. The latter will be a major technical challenge but it cannot be beyond us.

Yours sincerely



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