



## *Children's Charities' Coalition for Internet Safety*

Stephen Balkam  
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22 Old Steine  
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Dear Stephen,

John was pleased to be able to talk to you earlier today. We are pleased to hear that you remain so optimistic about the Internet Content Rating Association's (ICRA's) future and potential. We think you need to consider how you might spread that word because "out there", there is more than a little disquiet and restlessness about ICRA's seeming lack of impact and lack of progress.

As you know, a great many UK Government pronouncements have emphasized the importance of ICRA's work. For example, at the launch of ICRAfilter last year, the Home Office Minister who then had responsibility in this area, Beverley Hughes, said the following:

*"It's crucial that sites of all kinds are labelled and I recognise that Government and industry will both need to be part of the effort to get that message across, and so I'm particularly glad to have this opportunity to express our support for ICRA today. You may know that Cabinet Office guidance has, for some time, encouraged government sites to register with ICRA. I've recently written to Gus Macdonald in the Cabinet Office, and he's now agreed that this guidance will be changed next month to require rating of all government sites rather than simply encouraging it."*

Beverley Hughes, MP, (then) Parliamentary Under Secretary of State, UK Home Office, speaking at the launch of ICRAfilter at BT HQ, London, Thursday, March 21, 2002.

This sort of emphasis on labelling and the ICRA system is reflected in many other official announcements, including more recently by OFCOM and other bodies.

Similarly when one speaks to various leaders of the UK Internet industry, they cite their support for ICRA as evidence that they are making a positive contribution to finding a viable, public domain solution for keeping children safe on the Internet. When one looks at ICRA's membership list one sees several of the very biggest names in the business e.g. Microsoft, AOL, BT and Yahoo.

You will recall that last September, in "**Striking a Balance: The control of children's media consumption**", a joint report published by the Independent Television Commission, the British Broadcasting Corporation and the Broadcasting Standards Commission, several critical references were made to ICRA. In essence they were saying that ICRA was not doing what it said it would do. ICRA published a response, which is on your web site. Your reply was not so much a rebuttal as an explanation of the points BBC, ITC and BSC had identified. You plainly felt they had given insufficient weight to the history and context of the ICRA project.

The key section of ICRA's reply to the BBC, ITC and BSC was

*“(ICRA)filter has been developed to demonstrate a transparent, freely available tool to enable parents to control access to material they deem inappropriate or potentially harmful to their children and at the same time protect freedom of expression. **It is designed primarily to demonstrate filtering based on PICS and other techniques and is not, in itself, a complete consumer product.***

*This statement has been present on the filter page since it was launched. ICRA has never claimed that the filter is anything other than a tool to demonstrate how label-based filtering could work.”*

We are not sure the ICRA route has always been sold or promoted as being only “a tool to demonstrate how label-based filtering could work” but, being mindful of a fairly constant stream of complaints about the system's shortcomings which we have received from parents and children alike, some 6 months after ***Striking a Balance*** was published, and 12 months after Beverley Hughes's speech, we felt it would be timely to look at the issues again.

Before detailing our comments we ought to record that we have been long-time supporters of the idea of labelling. One of the signatories to this letter, John, has been on one or other of the Boards of the Internet Watch Foundation since it was established in 1996. Helping with the development of a new rating system was an important part of the IWF's early work. In 1998/99, when Internet Content Rating for Europe (INCORE) was founded and funded by the Commission of the European Union, John was appointed to its Steering Group by the European Federation for Child Welfare. INCORE was midwife to ICRA's birth in 1999.

It is against that long-standing and positive commitment to the ICRA idea that we record our great disappointment at its very obvious lack of material progress and impact. The work that ICRA has done on developing culturally neutral content descriptors has been outstanding but we think our overall criticisms nonetheless call into question the sincerity of the Internet industry's claims to be promoting ICRA and therefore, essentially, they question whether the ICRA model will ever work. If it will not, or if it will not do so within a reasonable timeframe, then the sooner we all recognize that and start looking for more efficient, alternative public domain ways for parents to protect their children online, the better it will be for all concerned.

ICRA's advice, published on its web site, says

“The safest way to label a site is to include the (label) in every page.”

We decided to try and see how many web sites had done this and we thought it was reasonable to start with ICRA's own members. Any site which had labelled every page would be awarded a “green light” by ICRA's Label Tester. If a site had a green light it would mean, depending on how a parent had set their preferences, a child could have full access to the whole of the site without the need for any parental intervention to issue a manual over ride. This has to be the best situation as the alternative, of constantly having to over ride a block, is just a nuisance and will put many people off using the system altogether.

The results were as follows:

Obtained a green light:

Parents Advisory Group for the Internet (Singapore)

R3Net (US)

T-Online (Germany) T-Online.co.uk and .com failed to get a green light

Failed to get a green light:

AOL.co.uk (AOL.com also failed), Bell Canada, BT, Cable & Wireless, Digimarc, IA Japan, Microsoft (MSN.co.uk also failed), SIIA, Tiscali, Verisign, Verizon, Yahoo.com (Yahoo.co.uk also failed)

It must be hard to persuade others to do something when the companies supposedly sponsoring this initiative will not do it themselves. This record of performance, or rather non-performance, is particularly disappointing in the context of ICRA where we have all said, all along, that it is a “chicken and egg” situation i.e. for more and more people to use ICRA it needs lots of other people to use it too. Leading by example is therefore of central importance to ICRA’s model.

Out of interest we tried to find any sites of non-ICRA members who got a green light. We found only two: Childnet International and NCH. We are sure there are others, but we just could not find any. Not even the Disney Corporation got through. In one test, where we were applying the ICRA system strictly, we had to use 9 manual overrides simply to reach the Disney home page. Surely this must raise issues about the workability of the model? If a parent has to intervene on 9 separate occasions to allow their child to see the home page of the Disney Corporation, isn’t there something very fundamentally wrong with the system?

In strict mode, despite Beverley Hughes’s statement, we were unable to find a single UK Government site that got a green light. Several carried the ICRA label on the home page e.g. Home Office, DTI, DCMS and 10 Downing Street, but none had rated everything. The Office of the E-Envoy not only failed to get a green light but it also failed to show or mention the ICRA label on its home page.

When we told ICRAfilter to apply the blocking rules less strictly the situation became even more confused and worrying.

For example, when Nudity was selected, following a Google search we were unable to access [www.hardsex.co.uk](http://www.hardsex.co.uk), but we were able to access a site giving a Christian perspective on naturism, and it was one which involved displaying a large number of full frontal nudes of both sexes, singly and together. We were then able to get on to [www.a-zsexpaysites.com](http://www.a-zsexpaysites.com) which boasted that it could take you to over 500 adult porn sites. The “tasters” that it provided could not legally be displayed in a public place in the UK because they showed a variety of sexual acts in very explicit detail.

We then selected for Violence. We were able to reach [www.violentcomix.com](http://www.violentcomix.com), [www.violentanime.com](http://www.violentanime.com) and [www.rape.to](http://www.rape.to). The latter site made much of the violence of its images, and it was not exaggerating.

We then selected for Language and, in Lycos, used a very common Anglo-Saxon expression. It found hundreds of sites and we were able to access all of the ones we tried.

When we selected for Chat we had no difficulty going to Lycos and joining their Chat service. You will know that when you join Lycos Chat you are asked for a variety of personal information which is then displayed in your profile. This is one of the key danger points about which we regularly warn parents.

So the way it looks to us is that if you apply the ICRA system strictly you can get at almost nothing, and if you apply it less strictly you can get at almost everything. In which case what is the value of either of them?

We appreciate that ICRA has always said that, ultimately, for it to succeed it also needs lots of organizations to develop their own templates. So far only three organizations have done so: a

US anti-tobacco grouping, the US-based Anti-Defamation League and a German child safety concern. As far as we can recall these same organizations had published their templates over two years ago, or thereabouts, which means that no new ones have come online since. We are not surprised it is still such a small number. The task of constructing a template and keeping it up to date is daunting if you have ambitions to provide comprehensive cover across the whole of the Internet.

We then made further enquiries about ICRA and were horrified to discover that not very long ago ICRA made several members of staff redundant and that even today all of the remaining staff are working 4-day weeks for want of finance. This further undermines any industry claims that it is seriously backing ICRA and, we are afraid, sits all too familiarly with the history of the IWF, another supposed Internet industry flagship, which has also been chronically under-funded by the industry since its creation.

Finally, we note what you say on your site about the SIFT project:

“Sift combines filters based on ICRA labels, lists, as developed and maintained by Optenet, and Artificial Intelligence analysis as developed by NCSR. An ICRAfilter-like module acts as chairman taking "votes" from the various modules as to whether a site should be allowed or blocked. Such a system makes full use of ICRA labelling whilst presenting users with a simple interface, but with further, detailed options available for those that want them. Other filters of any kind may be incorporated and used within the one platform. Beta testing is scheduled to begin in February/March with public release in June.”

SIFT sounds very exciting. It is a long way from the original ICRA idea but, as you said to John today, we have all learned a lot over the past few years. Our worry is, exciting though it may be, if history is anything to go by it may be many years before SIFT sees the light of day in a fully operational setting. That really would be completely unacceptable.

Your comments would be welcome.

As we have referred several times to the BBC, ITC, BSC report we are copying this letter to them also and it will go up on our web sites shortly.

Yours sincerely

The image shows two handwritten signatures in black ink. The signature on the left is 'John Carr' and the signature on the right is 'Chris Atkinson'. Both signatures are written in a cursive, flowing style.

John Carr

Chris Atkinson

Internet Adviser, NCH Policy Officer, NSPCC