Developing a "Family Friendly" Rating Service for ISPs

Summary

1.   **The aim of the "Family Friendly" rating service is to create, publish and maintain an objective source of information about the services, policies and practices of all UK-based Internet Service Providers from the perspective of child safety**. Whilst throughout the paper we have referred only to ISPs, it ought to be clear that important elements of the service could also be extended to providing a rating for major portals or other Internet-based providers of services aimed at children and young people e.g. chat.

2.   It is suggested that the new service ought to be publicly funded but independently administered either wholly by CHIS (children's charities) or by some combination of children's charities and other appropriate bodies that have no significant financial ties to ISPs or other Internet companies.

How it would work

3.   In principle the new Family Friendly rating service might operate in a similar way to "Which" or Michelin i.e. the service would independently evaluate what different ISPs are actually doing, publish its findings and promote awareness of those findings. The criteria to be used for the evaluation would, of course, also be published.

4.   Thus any person e.g. a parent thinking of switching ISPs or thinking of joining one for the first time, would be able to go to the web site, or ring up and ask to be sent an information pack, which provided them with the relevant information on a specific ISP or, perhaps, all ISPs (for practical reasons free access to the latter might only be available via the web).

5.   In a survey which NCH recently conducted it was quite clear that many of the sales staff of the ISPs had no real or in-depth idea of what their companies were actually selling, and even if they were to correct this obvious defect, there would still be no easy, readily accessible or reliable means of comparing the performance of different ISPs from the perspective of child safety. The new service would facilitate better-informed choices for those with a concern about child safety.

6.   The sorts of issues which the service would be likely to examine might include the following:

a)   How well does the ISP's initial sign-up routine work in terms of introducing/signposting the major child safety issues? How do they handle their already installed base in relation to safety questions e.g. do they send out regular reminders or updates?

b)   How well does the ISP promote child-specific features e.g. appropriate search engines, child-friendly sites, sites which might be helpful in terms of homework/ the national curriculum?

c)   How well does the ISP position and present child safety information e.g. in relation to its positioning on the home page and/or other major or relevant pages on their site?

d)   How well does the ISP handle the interfaces or proximities between adult and child-focused sections of its site?

e)   Does the ISP provide any paper-based, easy-to-understand advice and guidance to parents on child safety on the Internet?

f)   Are the ISP's support staff and sales staff knowledgeable about child safety issues i.e. do they provide accurate and prompt answers to consumer queries?

g)   Are the ISP's policies and procedures for reporting abuse across the site clear, easily accessible and efficient?

h)   Is the ISP also a chat service provider? If so, how do they deal with chat that they are directly responsible for e.g. do they provide moderated chat aimed at children? Do they provide appropriate information and advice in relation to their un-moderated chat, panic buttons and so on?

i)   Where the ISP is not a direct provider of chat services how well does the ISP handle/present information about IRC-based chat, or chat on other web sites, and how well does it present information/advice generally in relation to the need to remain vigilant and be NetSmart.[1]

j)   Where moderated chat is provided, are the ISP's standards acceptable e.g. how do they recruit, train and supervise their moderators?

k)   Does the ISP provide any extra technical solutions e.g. use of a proprietary or branded filtering and blocking programme and are they (a) optional but included in the cost of the service (b) optional but free for a period of time, (c) optional and available an extra cost (d) installed as the default and included in the cost of the service or (e) installed as the default but free for only a limited period?

l)   How are updates to such technical solutions handled?

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[1] It follows from the above that, in essence, we are saying we no longer think it is practicable to provide a kite-marking service in relation to individual chat rooms, but we could deal with chat in the way outlined.

m) Does the ISP provide direct access to Newsgroups (a) at all and (b) if so, is it to all Newsgroups or (c) do they exclude any groups e.g. those known to contain child pornography on a regular basis?

n) Does the ISP provide access to "Communities", "Talkboards" and similar communal facilities, and if so what policies are applied to them and how are they administered?

o) Does the ISP have robust procedures for verifying the identities and ages of its own members and do they attempt to verify the relationship of the master account holder to any sub-account holders?

p) Is CLI compulsory or are limitations applied to non-CLI customers?

7. This is not intended to be an exhaustive list. There may be things to add, or subtract. It is very much our first thoughts. The list is meant merely to indicate some of the sorts of information that we think ought to be easily accessible both in relation to an individual ISP and also for the purposes of making comparisons. Before the list is finalized it would need to be subject to consultation with various industry and other bodies.

8. One of the possible outcomes of the evaluation process could be that each ISP is given a rating or a score of some kind. We would have no objection in principle to an ISP publicizing whatever rating they were awarded either on their own web site or elsewhere. In time this could yield some revenue to help finance the project, although it would be important to avoid any suggestion that the service's ratings might be influenced by a possible need to earn revenues in order to sustain itself.

9. Whatever information is presented, it will always be made clear that, as in life, so with the Internet and with any and every ISP, nothing is ever going to be 100% safe. No individual ISP claims to provide a guaranteed 100% safe service and this much would be made clear in each and every case.

10. There will always be a need to ensure that children are properly informed about how to behave online, how to avoid trouble on the Internet and how to react should they, despite their best endeavours, still encounter it.

Four final points:

11. Firstly, for this service to work and be credible it has to be demonstrably free of any significant ties to the Internet industry. That means it needs to be financially independent of the industry, and ideally it would be publicly funded. We have suggested that the children's charities could manage the service because, in relation to children's welfare, they have a series of well-established and trusted brand images, and none of them have any major financial ties to any ISP or any internet company. Precisely how this would be done is a matter for further consideration. CHIS may or may not be the right vehicle. Other bodies may have an appropriate interest and therefore ought to be involved.

12.   Secondly while we think the Family Friendly rating idea stands entirely in its own right, the potential linkages to other issues e.g. the Clearing House, are obvious. We appreciate that, in establishing a new Family Friendly service, we would be developing a new organization or institution that would quickly develop a body of expertise and connections that might be useful in a number of areas closely related to other issues that the Task Force is looking at.

13.   Thirdly, there would clearly be a need for the Family Friendly service to have the facility to alter a rating for a particular ISP should its circumstances change. This might be based on complaints received, or a regular review mechanism, or some combination of the two.

14.   Fourthly, while we are motivated by a concern for child safety, it would be wrong to assume that only parents or others with a responsibility for children would be interested in the kind of information which this service would provide. There are almost certainly many cultural, social and religious interests who would also welcome it.

John Carr
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