UKCCIS Overblocking Working Group

Final Report

The background and findings of the overblocking working group, convened by and concluded under the auspices of the UK Council for Child Internet Safety, chaired by David Miles of the Family Online Safety Institute. November 2013 - December 2014.
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I. Introduction

On 22nd July 2013, Prime Minister David Cameron announced a range of new initiatives to make the Internet safer for children and young people. It was during this speech that the Prime Minister called for the establishment of the Overblocking Working Group under the UK Council for Child Internet Safety (UKCCIS):

“I know there are lots of charities and other organisations which provide vital online advice and support that many young people depend on, and we need to make sure that the filters do not, even unintentionally, restrict this helpful and often educational content. So I’ll be asking the UK Council for Child Internet Safety to set up a working group to ensure this doesn’t happen, as well as talking to parents about how effective they think that these filter products we’re talking about really are.”

This report, presented at the UKCCIS Executive Board meeting on 24th February 2015, provides a written record of the activities and progress of the working group. It presents key findings and potential next steps, whilst acknowledging concerns that were expressed in meetings.

The Prime Minister’s July 2013 speech followed on from an independent parliamentary inquiry into online child protection (April 2012), chaired by Claire Perry MP. The subsequent report recommended that the Government “should launch a formal consultation on the introduction of an Opt-In content filtering system for all internet accounts in the UK,” as well as seeking “backstop legal powers to intervene should the ISPs fail to implement an appropriate solution.” (Perry 2013)

On 28th June 2012 the Department for Education announced the details of a ten-week consultation on whether automatic online blocks should be introduced to protect children from adult content and harmful websites. In December 2012, the Government responded to this consultation on parental Internet controls. A headline finding of the report was that “Internet service providers had made good progress to date in implementing ‘active choice’ controls where all new customers are asked if they want to switch on parental controls.” The Government urged providers to automatically prompt parents to tailor filters to suit their child’s needs, by taking steps to prevent access to harmful and inappropriate content, this should be offered to new and existing customers. ISPs were encouraged to put in place appropriate measures to verify that the person setting up the parental controls was the account holder.

Following on from a summit hosted by Maria Miller, Secretary of State for Culture, Media and Sport, on 18th June 2013, the UK’s four leading ISPs (BT, Sky, TalkTalk, Virgin) agreed to offer all new customers a family-friendly network level filtering option by the end of December 2013.

The Department of Culture, Media and Sport (DCMS) described the ISPs’ commitment as meaning that “all new customers, on setting up their new broadband service would receive a prompt inviting them to set up family-friendly filters and that, should customers not engage with this process by, for example, clicking next, that filters should be applied. Where the filters are in place, these will apply to all devices in the home.
which connect to that internet connection and, in order to verify that the person setting the filters is aged 18 or over, that a closed loop email system of notification will be applied.”

Following the Prime Minister's speech, the DCMS asked Ofcom to produce a series of regular reports on the implementation of family-friendly filters, meaning easy to use network level software that can be used to filter multiple devices in the home. The first and third of these reports looked primarily at take-up, awareness and confidence of parents in relation to parental controls, and the broader strategies parents may adopt to improve children’s online safety, while the second report focused on the ISP’s implementation of whole home filtering.

As part of Ofcom’s annual Children and Parents: Media Use and Attitudes Report published on 9th October 2014, questions about parents’ perceptions of the efficacy of home network-level filters.

Finally, in the same month as the Prime Minister's speech on online safety, the UK Mobile Network Operators (MNOs) voluntarily transferred responsibility for the classification framework from the Independent Mobile Classification Board to the BBFC. This included collecting reports on overblocking, the results of which have been published quarterly.

The first working group meeting, held on 1st November 2013, was scheduled three months after Prime Minister's speech, more details of which can be found in the next section.
II. Working Group Meetings and Deliverables

Under the auspices of the Department of Culture, Media and Sport the UK Council for Child Internet Safety was asked to establish the Overblocking Working Group with the key objective of ensuring that the newly deployed network level, family-friendly filters implemented by the UK’s four leading ISPs (BT, Sky, TalkTalk and Virgin Media) did not inadvertently block websites providing support, educational and crisis services that could be important to the well-being of young people.

The working group was chaired by David Miles of the Family Online Safety Institute (FOSI). FOSI is an international charitable organisation which works to make the online world safer for kids and their families and is a member of the Executive Board of UKCCIS.

The working group held four meetings total, on the dates of:
- 1st November 2013
- 27th February 2014
- 11th July 2014
- 24th November 2014

On 16th June 2014 the DCMS, in conjunction with the four ISPs, agreed the following terms of reference:

**Chair and Representatives:**
The chair will be drawn from the UKCCIS Executive Board and will bring progress of the group to the Board as requested by the Ministerial chairs

Representatives of this group will include the four main ISPs, key charities, parenting representatives, members of academia and government officials. (See Appendix V.c.)

**In Scope:**
This work relates to Internet services provided by the four main ISPs: BT, Sky, TalkTalk, and Virgin Media.

Unintentional overblocking or ‘false-positives’ refers to content that is inadvertently blocked by a filter, i.e. content that customers have not chosen to block when switching filters on as part of configuring their broadband service.

**Out of Scope:**
Content which parents have chosen to block by selecting a filtering category, for example a particular content category or content included on a blacklist.

Issues of under blocking. While a related issue, under blocking will require consideration of the experience of parents in using parental internet controls; it is expected that this work will be taken up through UKCCIS, and with the main ISPs, on an ongoing basis. Government anticipates that the increased take up of parental control tools will create an effective mechanism for consumers to help improve efficacy.
Deliverables:

ISPs checking for the inadvertent blocking of URLs provided by charity representatives – by May 2014.

ISPs to develop and implement a single, centralised process for site owners to check the status of their site and report cases of overblocking – by July 2014.

Group to develop and monitor metrics outlining estimated number of overblocking errors – to December 2014.

Subsequently, the working group convened on 11th July and raised the issue of content versus form. Representatives from social media and interactive entertainment initiated a discussion about the potential for the mis-classification of content when included under a broader category like gaming or social media. This debate highlighted the need for greater visibility of individual filtering products, their settings and content categorisation. This culminated in a workshop hosted on 31st October by the DCMS in which all four ISPs showcased their filtering products, sought the input of the working group and answered questions.

The final working group meeting was held on 24th November 2014, during which some additional deliverables were achieved. Specifically, the charities’ original recommendation of a “universally accessible” list of charities to remain unblocked by filters evolved, with their support, to just include ChildLine and other emergency support for young people, including their individual forums.

Additionally, several recommendations from the charities and interactive entertainment/gaming sector would be carried forward on a goodwill basis, possibly through absorption into another working group. These included:

- A clear course of communication to engage and support the voluntary sector, to enhance their understand of filtering issues and encourage them to check their URLs through Internet Matters in cases of suspected overblocking that may impact access to services.
- Addressing the issue of form versus content in order to ensure that education and quality support is still accessible to young people in various forms; be this editorial, service communities or games.

At the UKCCIS Executive Board meeting held on 4th December 2014, it was proposed and decided that the working group in its current form would come to an end.
III. Key Findings

a. Deployment and Take-Up

The working group was established in the very formative stages of the ISPs’ deployment of family-friendly, network level filtering. In 2013, according to Oftel, there were 19.6 million household broadband subscribers and the four leading ISPs represented 85% of this number. The ISPs launched their new filtering products on the following dates:

- 9th May 2011 - TalkTalk
- 14th November 2013 - Sky
- 13th December 2013 – BT
- 27th February 2015 – Virgin Media

TalkTalk’s network level, family filtering HomeSafe network filtering solution had already been in place since May 2011. This may be reflected in the higher take up rates in Ofcom’s Internet Safety Measures Report (Ofcom July 2014):

- BT – 5%
- Sky - 8%
- TalkTalk – 36%
- Virgin Media - 4%

Commonly raised variables in the uptake of filtering by individual household may include:

- Households without children
- Households with existing device-side parental control software
- Households with several children at different ages
- Households where parents choose not to filter their children’s Internet access.

Ultimately, it has been widely acknowledged that network filters are only one of many tools available to families and no substitute for parents talking to their children about how to make wise choices online.

b. ISP Reporting Data

One of the key deliverables of the working group was that the ISPs develop and implement a single, centralised process for site owners to check the status of their site and report cases of suspected overblocking.

From June 2014, the four ISPs implemented a report link on the Internet Matters contact page to enable site owners to check the status of URLs and report cases of overblocking. While response times differed, all ISPs held individual policies of response within seven working days. On behalf of the ISPs, Internet Matters published two sets of reporting data from web masters and consumers in October 2014 and January 2015. Internet Matters is an independent, not-for-profit organization and portal to help parents keep their children safe online. This fulfilled the second of the working group deliverables, “Group to develop and monitor metrics outlining number of overblocking errors.” (See Appendix III.b.)

To date, no webmasters have reported that the ISPs are overblocking their websites via Internet Matters, and a similar low level of activity is reflected in the data from
the UK mobile operators (EE, O2, Three and Vodafone), which is published quarterly by the BBFC since September 2013 in conjunction with the Mobile Broadband Stakeholder Group.

As the ISPs have deployed and refined their filtering solutions, so charities have been able to provide input and bring valuable sector expertise (see Appendix a.i.). A supplemental exercise such as a DCMS-hosted workshop allowed the four ISPs to demonstrate their products and answer questions, which was helpful in emphasizing the value in collaboration between stakeholders.

**c. Achievement Against Deliverables**

Based on the terms of reference agreed by the DCMS on 16th June, the working group had fulfilled all three deliverables:

- The ISPs refined and updated their filters to reflect content categorization issues raised by the charities.
- The four ISPs implemented a webmasters’ reporting link from June 2014 in conjunction with the Internet Matters portal. Each ISP provides links for consumers through their own branded product offerings.
- The ISPs continue to consolidate reported data both from webmasters and consumers.
IV. Next Steps

Following the closure of the working group, and review of documented discussions from quarterly meetings, the following steps have been outlined to reflect where there is best potential in ongoing efforts to keep inadvertent overblocking at a minimum.

1. ISPs to consolidate and report data in conjunction with the DCMS and Ofcom. Any new data on overblocking would be included in these public reports.

2. Internet Matters will continue to host the overblocking report link for webmasters, and, following communications outreach to charities (see II. Deliverables) may be reviewed to assess its effectiveness. The deployment of the report link to other parental guidance websites may be considered.

3. An ongoing, goodwill focus by the ISPs and appropriate stakeholders (see Deliverables) on the two remaining working group issues, as discussed at the 4th December UKCCIS Executive Board meeting, specifically; ensuring necessary communications with the charitable youth sector and; addressing the debate of mis-categorisation based on content versus form.

4. To examine the possibility of a common set of content classification, reporting and age appropriate network-level filtering standards, the commonality of which may make it easier for industry and charities to craft consistent, easy to understand guidance for families.
Internet Matters
Overblocking Report Oct 14 – Jan 15

Since June 2014 Internet Matters have incorporated a ‘report’ facility, which enables site owners to report, by email, instances of overblocking and also check the status of their site across all four Internet Services Providers.

7% of all emails to internet matters were sent to the report@internetmatters.org

Breakdown of emails received to the ‘report’ email:-
To date no site owners have reported that the ISP’s were blocking their sites. The majority of emails received were related to unwanted Parental Controls pop ups from the ISP’s.

Over the period there were 1900 visits to the contact us page, 0.6% of total page views

Exit points to ISP Parental Controls Pages (number of sessions)

- Virgin, 865
- Sky, 1602
- BT, 4283

- TalkTalk, 943
c. Participating Organisations

- BBC
- BBFC
- Brook
- BT
- CEOP
- CHIS
- Department of Culture, Media and Sport
- Facebook
- Home Office
- International Social Games Association
- Internet Matters
- KCom
- Open Rights Group
- Mobile Broadband Stakeholder Group
- Nominet
- NSPCC
- Ofcom
- Online Dating Association
- The Parent Zone
- Portland TV
- RDI
- Sky
- Stonewall
- Symantec
- TalkTalk
- Ukie
- Virgin Media
- YouthNet
- Yahoo!