

REPORT

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A handwritten signature in black ink that reads "W Brown".

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The Standards Requirements for Consumer Internet Filtering Tools

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0 Introduction

0.1 Nearly half of all people in the European Union are now internet users.¹ A very large proportion of them use the internet for the purposes of education, work, communication and commerce. However, even though the internet is becoming part of every day life, internet content remains unregulated and is a major factor in its success and popularity. Potentially harmful and illegal material exists on the internet and the European Union has launched a programme called Safer Internet Plus that will last for four years from 2005 to help prevent harm from that content.

In response to concerns about unregulated content, consumers are turning to filtering tools to protect children and to defend themselves against viruses and unwanted 'spam' e-mail. There is, however, debate about the quality of these tools. Test reports in various countries show that their performance varies dramatically and consumers find many difficult to use, install and maintain. Some argue that this poor performance harms the credibility of all filter tools and can encourage children to try to circumvent or even disable the filters.

There are many sources of information about the variety of filter tools that exist, but very few comparative reports that are based on objective testing. One proposal to help consumers make informed choices when purchasing filter tools is for standardisation or benchmarking. The standard could then be used to help consumers make informed purchase decisions. They would be able to expect a filter tool that meets the standard to perform to a certain level. In the case of internet content filtering for example, parents could rely on a filter that meets the standard to block the bulk of inappropriate content.

If such a standard covered issues such as ease of use and installation, as well as filtering performance, then consumers would have more confidence that they would be able to install, configure and maintain the filter.

0.2 This report explores the proposal that consumer internet filtering tools need to be subject to standardisation. The research covers internet content filtering software tools, spam filtering software and Internet Service Provider (ISP) based filtering services. The issue of internet content delivered through mobile phones is considered separately.

¹ <http://www.internetworldstats.com> accessed 29 November 2005

Section One looks at relevant research that illustrates how children are vulnerable to age inappropriate content and how filter tools are used by families.

Section Two explores what is happening in seven countries across Europe. Views from various consumer organisations and non-governmental organisations are included here.

Section Three describes number of initiatives on filter accreditation or benchmarking. This section also looks at current initiatives to create a common platform for website labelling. This is seen by some as an alternative strategy to filtering content.

Section Four looks at the issue of internet content on mobile phones.

Section Five is a description of some recent consumer internet filter tests.

Section Six describes the most important themes and arguments that emerged from the country profiles.

Section Seven draws some conclusions regarding the need for standardisation of internet filters.

0.3 The research was undertaken during July, August and September 2005 by Colin Meek and Roy Brooker. Consumer organisations and other stakeholders with an interest in internet filters were contacted in a number of EU countries. The other stakeholders were largely non-governmental organisations drawn from the EU Safer Internet Programme nodes², except where the consumer organisation or other information showed there were more appropriate contacts available. A structured email questionnaire or telephone interview format was used to ensure coverage of the relevant issues (see section 2 for structure). The results from seven countries are included in this report. Each country was also asked for information about the products available to consumers in that country, and whether there had been any product tests (see section 5).

0.4 In order to set the consumer organisation and other research into context, existing work and initiatives at country or European level to investigate and set product standards were also identified. These appear in section 3.

² <http://www.saferinternet.org/ww/en/pub/insafe/focus.htm>

1 Background

Several recent research projects have focused on the way children use the internet. This research has also examined the use of filter tools, the way they are used, how useful they are and how children react to them. This research provides useful context and helps illustrate the ways children are vulnerable to potential harm from online sources and how parents are attempting to protect them. Several of the EU Safer Internet nodes in EU countries are using this research to shape their strategies for awareness campaigns on internet safety. Furthermore, many of the comments made in response to the research for this paper were influenced by key results published in the following projects.

1.1 UK Children Go Online

The UK Children Go Online (UKCGO) project set out to explore internet use among nine to 19 year olds in the UK and explore children and young people's own perspectives on the internet. It was co-funded by a range of stakeholders including UK's Economic and Social Research Council, AOL UK, Childnet-International, Independent Television Commission (ITC) and Ofcom (UK's Office of Communications). It used focus groups among nine to 19 year olds and a national survey of 1,511 nine to 19 year olds across the UK.³

1.1.1 Access, use and communication

The research found that among nine to 19 year olds:

- Three quarters had access to the internet at home.
- More than 90 per cent have accessed the internet at school.
- Nearly 20 per cent have access in their bedrooms.
- The vast majority use the internet at least every day or every week.
- Internet access is mostly used for homework.
- 21 per cent admit to copying material online and handing it in as their own, eight per cent claim to have 'hacked' a site or e-mail, five per cent have visited

³ UK Children Go Online. Final Report of Key Project Findings. Sonia Livingstone and Magdalena Bober. April 2005.

an online dating site, four per cent have sent a message to make someone feel uncomfortable or threatened and two per cent admit to online gambling.

- Most online communication is with local friends.
- A quarter of those aged 12 to 19 who use the internet weekly go online to get advice.

1.1.2 Undesirable content

Of those aged nine to 19 who go online at least once a week:

- More than half have seen pornography while only 16 per cent of parents think their child has seen pornography on the internet.
- Most pornography is seen unintentionally.
- Half of those aged 18 to 19 who have seen pornography now think they were too young to have seen it when they did.
- Just over 20 per cent have accidentally found a site with violent or gruesome pictures while 12 per cent have viewed these sites on purpose.
- A significant minority of those who have seen violent sites are disgusted (27 per cent).
- The younger a child is, the more upset they are by undesirable content.
- One third say they have had unwanted sexual or nasty comments via e-mail, chat, instant messaging or via text and parents substantially underestimate their children's negative experiences online.
- Only 49 per cent of children say their parents have told them not to divulge personal information yet more than 80 per cent of parents say this rule exists in their home.
- Nearly half have given out personal information online.
- One in 12 say they have met face to face with someone they first met online. The vast majority say they tell someone about such a meeting or take a friend.

1.1.3 Restricting access in the home

- One in 10 parents say they don't know what their child does on the internet and one fifth say they don't know how to tell their child to use the internet safely.
- While 46 per cent of parents say filtering software is installed on their computer, only 35 per cent of children say the same. Nearly a quarter of parents don't know if a filter is installed.
- Only 15 per cent of parents say they know how to install a filter.
- Two thirds of nine to 19 year olds who use the internet at least once a week say they don't want their internet use to be restricted or monitored.
- Two thirds of those aged 12 to 19 have hidden their internet use from their parents. 12 per cent have used someone else's password without permission.
- Children appear to be more skilled at computing than their parents.
- Two thirds of parents want to see filtering software improved; 54 per cent want improved parental controls and 51 per cent want improved monitoring software.

1.2 Emerging Trends amongst Primary School Children's use of the Internet

This research was carried out by the Cyberspace Research Unit at the University of Lancashire in 2002 and 2003. Two surveys were carried out involving more than 1400 8-11 year olds.

This research shows that an increasing number of parents are using filtering as a way to protect their children. In 2002 25 per cent of children said a filter was being used on their home computer. In 2003 that figure had risen to 40 per cent. Slightly more than 20 per cent of the children surveyed said they knew how to disable the filter on the computer.⁴

1.3 What do Saft Kids Do Online?

Safety, Awareness, Facts and Tools (SAFT) is a European project that includes a consortium of partners in Norway, Denmark, Iceland, Sweden and Ireland. It aims to teach children and teenagers how to reduce 'risk' behaviour online. In 2003 it

⁴ Emerging Trends amongst Primary School Children's use of the Internet. Cyberspace Research Unit. February 2004.

interviewed 10,000 children and parents for a major research project published that year. The target age group of children surveyed was nine to 16 years old.

1.3.1 The survey found that:

- 81 per cent had access to the internet at home.
- Nearly one quarter of children had more than two e-mail accounts.
- Playing games online is the most popular online activity.
- Parents do not know what their children do online. For example, while more than half of all children use the internet for e-mail, only 18 per cent of parents think their children use e-mail. While 26 per cent of children download software, only one per cent of parents think their children do this.
- 61 per cent of children have used internet chat.
- 14 per cent of children have been harassed, upset, bothered, threatened or embarrassed by someone while chatting within the last month.
- 30 per cent have received unwanted sexual comments on the internet.
- 25 per cent of children have visited hateful websites and many found this upsetting.
- 32 per cent of children have visited violent websites by accident or on purpose, only 16 per cent of parents think this has occurred.
- While 46 per cent of children have visited a site with pornography by accident or on purpose, only 21 per cent of parents think this has occurred.
- A quarter of children in Sweden have met someone in real life that they first met on the internet and 16 per cent of all children in the survey have met someone who turned out to be an adult who introduced themselves as a child on the internet.
- 30 per cent of children have access to the internet in their own bedroom⁵.

⁵ What do children do online? – Facts from the SAFT project. Presentation by SAFT Project Manager. 2004.

1.4 Summary

The above research findings are important for a number of reasons. They reveal that children are exposed to known risks on the internet. For example, they divulge personal information, they access potentially harmful material (either intentionally or unintentionally) and some find this material distressing. Furthermore, children do use the internet to meet people face to face that they first met online and parents greatly underestimate the children's negative experiences online. The research also shows that children are technically competent and informed and use a variety of Internet tools, all of which can contain harmful content.

The research also shows that parents are concerned about their children's use of the internet and do attempt to control access and impose rules. However, there is a very real difference between what parents think their children are doing online and what children are actually doing. In addition, there is serious confusion about filtering. Parents are much more likely to think that filter tools are in place and operating than the children are. The UKCGO report points out that only 15 per cent of parents are confident about how to install a filter. The UKCGO also makes it clear that parents want better filter tools that are easier to use.

Even so, the UKCGO report author points out that there are no simple solutions to the problem of harmful content. Filters should be used sensitively because unwelcome restrictions imposed on children may do more harm than good by encouraging children to evade the filter tools or to try and disable them.⁶ Children may also react negatively to filters if the filters lack credibility through poor performance. A careful balance must be struck between balancing the opportunities the internet brings against its risks and that the debate about filters must include a recognition of the rights children have to privacy. (See Section 3 for more detail on this).

Many people consulted for this report state that filtering tools should never be seen as the full solution to internet safety. Instead they stress that filtering tools are only one useful element. However, during the course of the research for this report it was repeatedly stressed that the filters are only useful if they function effectively.

⁶ UK Children Go Online. Final Report of Key Project Findings. Sonia Livingstone and Magdalena Bober. April 2005.

2 Country Profiles

2.1 – Austria

Population: 8,160,000

Internet Penetration: 57 per cent (above EU average)⁷

2.1.1 Austria – Summary

The Safer Internet node for Austria (SIA) has carried out some limited ‘field trials’ where internet content filters have been used in real situations among families with children of all ages. SIA and the consumer organisation Verein für Konsumenteninformation (VKI) are not aware of any other formal comparative testing carried out in the country. Both organisations think internet content filters suffer from ‘cultural bias’ because they are developed in English speaking countries. They also argue that internet content tools are not a substitute for parental involvement in educating young people about the internet and both say that content filtering tools are not widely used in Austria. VKI supports the proposal for minimum standards for content filters, but SIA said it is very difficult to use standards to promote better usability.

<p>2.1.2 What work has been done to assess consumer internet filters?</p>	<p>The Austrian consumer organisation VKI has not carried out any tests on content or spam filters. Instead, VKI has participated in the European ‘ERICA’ project on internet safety,⁸ and has organised its awareness campaign on internet safety. It is also cooperating with the Austrian Association of ISPs on issues related to spam filtering.⁹</p> <p>The Austrian Institute for Applied Telecommunication is part of the consortium chosen as the EU Safer Internet node for Austria¹⁰ (SIA). This consortium has not carried out any formal tests but it has organised ‘field trials’ on content filters. In these trials, families have used filters in real-life situations and reported back to the Austrian node. These trials looked at filter software products and server-based filters for children of all ages. Some of the results are published on the node’s internet site.^{11 12}</p>
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⁷ <http://www.internetworldstats.com> accessed 29 November 2005

⁸ <http://www.net-consumers.org/erica/guide.htm>

⁹ Interview. VKI

¹⁰ http://europa.eu.int/information_society/activities/sip/index_en.htm

¹¹ <http://www.saferinternet.at/thVKI> emen/unerwuenschteinhalte.php#d4

¹² Interview. Austrian Institute for Applied Telecommunication.

<p>2.1.3 Are there any concerns about the products?</p>	<p>VKI's main concern is that there is 'cultural bias' because the market is dominated by US products which don't serve the Austrian market well. VKI advises that parent should not view filters as a solution to preventing children from accessing inappropriate content. VKI estimates that less than a third of families currently use some form of content filter.</p> <p>Through its own field trials and its observations of the Austrian market, SIA has found that:</p> <ul style="list-style-type: none"> • content filters often filter incorrectly; • some filters did not work effectively on computers that had multiple user accounts; and, • some were much too difficult to use. <p>SIA said that many children are able to access the internet in several different ways. For this reason, parents should realise that filters on home-based computers are of limited value.</p>
<p>2.1.4 Do stakeholders think the products perform well?</p>	<p>VKI states that content filtering products probably do what they claim in English speaking countries but not if you speak German. It is also concerned that they are not as simple to use as they should be and the products may not always be compatible with operating systems in use. VKI is more positive about the ICRA system of internet site self-labelling. However, it said that this relies on providers rating their own content.</p> <p>The Austrian Safer Internet node said spam filters work much better than internet content filters. Many ISPs now offer effective spam filter options. On the other hand, it said content filtering is not used widely because the products are not efficient and they are not free.</p>
<p>2.1.5 What do consumers require of filters?</p>	<p>VKI said that if the products were less culturally biased and easier to use then they would be more likely to meet consumer requirements.</p> <p>The Austrian Safer Internet node believes that content filtering should be integrated into internet browsing software. This would make it more usable because consumers are reluctant to buy and configure 'add-on' software. It added that perfect filtering is only possible if the software is perfectly configured –</p>

	and this takes time and experience. The node said that spam filters can suffer from similar problems but that ISPs are doing far more to solve the problem of spam.
2.1.6 Is the product choice too limited?	VKI had no comment. The Austrian Safer Internet node said the product choice was not restricted.
2.1.7 Are you aware of other projects to help consumers make informed choices?	VKI said that providers are involved in a project on spam and content filtering. Information on this can be found at: www.ispa.at The Austrian Safer Internet node said that it is not aware of any other organisation offering product advice specifically for Austrians. The node's site refers users to the German industry self-regulation site www.fsm.de which carries some detailed information about filter products in German. ¹³
2.1.8 Should there be minimum standards?	VKI said the products should meet certain minimum standards and should be open, transparent and user friendly. SIA is not sure that minimum standards would help. They said most of the problems with the filters are related to usability and that is something that is very hard to standardise. They also said that standards would not necessarily solve the problem of cultural bias. Austrians and Germans have access to the same products, but have very different youth protection laws. SIA said that a system would have to work almost perfectly before the node could recommend it to parents. SIA said the ICRA filtering project is well known but low participation means it is not yet useful for parents.

¹³ <http://www.fsm.de/?s=Zugangskontrollprogramme>

2.1.9 Market Information

The Austrian Safer Internet node advises users to visit the German self-regulation site www.fsm.de for information on content filters. That site lists the following filters as available:

ICRAplus

Cybersitter

Netnanny

CyberPatrol, Surfwatch and SurfControl

Cyber Snoop 4.0

Parents Friend

We-Blocker

In addition to the many products that are also obviously available via the internet, some other Austrian-based companies offer filter services. Most of the main broadband providers (such as: www.aon.at, www.chello.at and www.inode.at) offer some kind of filtering service although this may be restricted to spam filtering. The Austrian software company www.ikarus-software.at also offers stand-alone anti-spam software for home users.

2.1 – Sweden

Population: 9,040,000

Internet Penetration: 75.2 per cent (well above EU average)¹⁴

2.1.1 Sweden – Summary

The Media Council is part of the Swedish Ministry of Culture and is part of the consortium making up the EU Safer Internet awareness node for Sweden. This awareness node does not think filters have a significant role to play in protecting children online. A common saying in Sweden is: 'It is better to build a filter in a child's head than in the computer.'¹⁵ As a result, filters play almost no part in the campaign on internet safety organised by Safer Internet Sweden (SIS). Schools themselves place emphasis on 'source criticism' and only 14 per cent used filters in 2003. SIS said that cultural differences in Europe may make it very difficult for common standards to be adopted.

ISPs are working with the Swedish police to stop access to child pornography.¹⁶

The consumer organisation Konsumentverket has not carried out any tests on filters and said its main concern about them is that consumers can find their filter products become incompatible with updated operating software.

<p>2.1.2 What work has been done to assess consumer internet filters?</p>	<p>The Swedish consumer organisation Konsumentverket has not carried out any tests on internet filtering tools. However, it has included information about filters in articles on firewall software in its magazine Råd&Rön. Firewalls were tested and compared but the articles (in 2003 and 2005) did not focus on filters.¹⁷</p> <p>SIS is not aware of any filter tests that have been carried out in Sweden. SIS places a great deal of emphasis in the role of the parent in educating children about the benefits and risks of the internet. SIS said that very few parents in Sweden use content filters and that the awareness node did not think they have a significant role to play in protecting children. A survey carried out by SIS in 2003 found that only 14 per cent of schools used internet filters.¹⁸</p>
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¹⁴ <http://www.internetworldstats.com> accessed 29 November 2005

¹⁵ Interview. Swedish Media Council.

¹⁶ Interview. Swedish Media Council.

¹⁷ Interview. Konsumentverket.

¹⁸ Interview. Swedish Media Council.

2.1.3 Are there any concerns about the products?	<p>A Konsumentverket spokesman said their main concern about filters is that they often have a very short life because as operating software is updated, the filter software becomes incompatible. He said this is often a problem linked to firewall software.</p> <p>SIS is very concerned about the reliability of content filters. The node also said that they may actually cause more problems than they solve because parents may install filters and then assume their children are protected. One reason why so few parents use filters is because so many operate in English.</p>
2.1.4 Do stakeholders think the products perform well?	<p>Konsumentverket said it could not comment on this issue in any detail.</p> <p>SIS said it could not comment on this because there is so little debate and attention given to filters in Sweden. SIS did say that the ICRA system of filtering was too blunt and was not reliable. SIS said that it was not familiar with the other EU funded filter projects.</p>
2.1.5 What do consumers require of filters?	<p>Konsumentverket said it could not comment on this issue in any detail.</p> <p>SIS said filters should:</p> <ul style="list-style-type: none"> • be easy to use; • be technically easy to understand; and, • operate in Swedish. <p>They added that if a filter product was developed in Swedish for young children (a walled-garden) then that may encourage more parents to use them.</p>
2.1.6 Is the product choice too limited?	<p>Konsumentverket had no comment.</p> <p>SIS said the choice was very limited and there was practically no advertising of filter products.</p>

<p>2.1.7 Are you aware of other projects to help consumers make informed choices?</p>	<p>Konsumentverket said that there are several Swedish magazines that carry reports on filter products. The organisation said that Swedish consumers would typically use portals such as http://www.idg.se to look for information about filters.</p> <p>SIS said it was not aware of any other organisation that had carried out any tests.</p>
<p>2.1.8 Should there be minimum standards?</p>	<p>Konsumentverket said it had not developed any policy on this issue. The spokesman said they did not think standards would help as the technologies companies were deploying were changing so fast.</p> <p>SIS said that standards would be very difficult to develop because of cultural differences through the EU. They said that attempts to create a common framework for film classification in Europe has failed for this reason. Different countries have different definitions of what is inappropriate content. However, they did say that the computer games industry in Europe has agreed on a common way to rate products to give consumers information on content. This system uses small 'pictograms' to quickly inform consumers about whether games include specific content such as violence, sex, drugs or discrimination. These pictograms can be seen on the PEGI website.¹⁹ SIS said it may be possible for a future European project on internet filters to learn from the PEGI initiative in the way site labelling could be developed or filters made easier to configure. (See section 3 for more on site labelling).</p>

2.1.9 Market Information

Konsumentverket said that Swedish consumers would use portals such as <http://www.idg.se> to look for information about filters. Overall, there seems to be very little advertising for filter products and very low consumer awareness.

¹⁹ <http://www.pegi.info/pegi/index.do>

2.1 – Italy

Population: 58,608,000

Internet Penetration: 49.3 per cent (equal to EU average)²⁰

2.1.1 Italy – Summary

The Italian consumer organisation Altroconsumo has published detailed tests on internet content filters and spam filters. The organisation were able to recommend only three out of 18 content filters and found that most of the filters failed to block many unsuitable sites. The spam filters performed better overall.²¹

Adiconsum – the Italian Association for Consumers and Environment Protection, is part of the consortium chosen to be the EU Safer Internet awareness node for Italy. It has also carried out tests on content filters and found most to perform very badly and that all of them could be disabled by competent teenagers.²²

<p>2.1.2 What work has been done to assess consumer internet filters?</p>	<p>The Italian consumer organisation Altroconsumo has published detailed test results on internet content filters in 2002 and spam filters in 2004. The content filter report compared 18 filters and concluded that only three filters met ‘expectations.’ More information on this report can be found in Section 5.²³</p> <p>The Altroconsumo analysis of spam filters was published in 2004. This compared and tested 16 filter products and found seven performed well overall. See section 5.²⁴</p> <p>Adiconsum also published a detailed test report on internet filters in 2001. This analysis of 10 filters found that the products had many drawbacks. See section 5.²⁵</p>
<p>2.1.3 Are there any concerns about the products?</p>	<p>Altroconsumo advise parents that filter tools should never be seen as a complete solution to internet safety. The organisation is also concerned that many teenagers are more capable with computers than their parents and are therefore capable of disabling filters. Altroconsumo also said that the filters are culturally biased because they filter content according to US preferences. On spam Altroconsumo said</p>

²⁰ <http://www.internetworldstats.com> accessed 29 November 2005

²¹ Interview. Altroconsumo.

²² Interview. Adiconsum.

²³ A Tighter Linked Network. Altroconsumo, 2004.

²⁴ There’s (too much) mail for you. Altroconsumo, 2004.

²⁵ Analisi di prodotti di Content Filtering per il progetto Internet Friendly. 2001

	<p>ISPs should be doing more to filter spam at a server level.</p> <p>Adiconsum is concerned that children can easily disable most of the filters. It also thinks that the filters are not flexible enough and that parents can't personalise them. The organisation said that the issue of cultural bias should be separated from the issue of language. It said the definition of cultural bias is that the products are not sensitive enough or flexible enough to adapt to the needs of different countries – regardless of operating language.</p>
2.1.4 Do stakeholders think the products perform well?	<p>Overall, Altroconsumo said the general performance of the content filters was weak. Spam filters generally perform better.</p> <p>Adiconsum said the overall performance was poor.</p>
2.1.5 What do consumers require of filters?	<p>Altroconsumo said they don't have a clear view of what consumer expectations are. Overall, they think consumer expectation are met, but that is because their expectations for the products are probably very low.</p> <p>Adiconsum said filters should:</p> <ul style="list-style-type: none"> • come with better instructions; • be more flexible to be able to adapt better to different countries; and, • be easily configured so that they can be adjusted to reflect the age of the child.
2.1.6 Is the product choice too limited?	<p>Altroconsumo does not think the product choice was too limited but does think there should be more that are Italian. One Italian product is available and was developed by a organisation of Priests – www.davide.net/it</p> <p>Adiconsum had no comment.</p>

2.1.7 Are you aware of other projects to help consumers make informed choices?	Altroconsumo and Adiconsum were not aware of other initiatives.
2.1.8 Should there be minimum standards?	Altroconsumo said this would be helpful to allow consumers to identify and avoid the very bad products that do exist. Adiconsum had no comment

2.1.9 Market Information

Products listed in the 2002 Altroconsumo report included filters developed by:

McAFEE

N2H2 Inc

We-Webcorp.com

One Light Corporation

Solid Oak Software Inc.

Virgilio

Watchsoft Inc.

Spycatcher Corporation

Symantec

Surfcontrol

S4F (Safe 4 Families) Inc.

Icognito Technologies Ltd

A.Value Systems

Net Nanny Software

Optenet.com

Security Software Systems

8e6 Technologies

Pearl Software

Products listed in the 2004 Altroconsumo report included spam filters developed by:

Cloudmark

Norton

INBoxer

MatterFormMedia

McAFEE

Sunbelt Software

Giant Company Software

Spamihilator

Edovia Technologies

Surfsecret

Lyrus

Spampal

Mailwasher

Spambayes

EMC

High Mountain Software

2.1 – Czech Republic

Population: 10,440,000

Internet Penetration: 46.9 per cent (marginally below EU average)²⁶. From 2000 to 2005 the Czech Republic had one of the highest growth rates in internet users in the whole of the EU (380 per cent).

2.1.1 Czech Republic – Summary

Internet content filters are hardly used in the Czech Republic. According to the newly launched EU Safer Internet node for the Czech Republic (CzeSI) the Czech population is very suspicious of anything that resembles censorship or restrictions on freedom of access to information. As a result, content filters have suffered from bad publicity. While CzeSI intends to offer advice to the public about filters, it will be doing this cautiously through a wider campaign on internet safety. Initially, there will be no focus on filters.²⁷ CzeSI said that it would like to see more ISPs offer filtering services. The Consumers Defence Association of the Czech Republic (SOS) said filters are hardly used by anyone.²⁸ Both organizations support the development of standards.

<p>2.1.2 What work has been done to assess consumer internet filters?</p>	<p>The Consumers Defence Association of the Czech Republic (SOS) has not carried out any tests or surveys comparing filter products. SOS has, instead, focused on the rights individual consumers have in the face of commercial spam. SOS said that internet content filters are used only very rarely.²⁹</p> <p>CzeSI said that it intends to offer consumers firm advice about filters in the future but has not yet done any testing.</p>
<p>2.1.3 Are there any concerns about the products?</p>	<p>SOS said that internet content filter use is low because the products are not localised. SOS is not aware of any Czech products. Spam filters are used more widely. Remarkably, one fifth of the country's entire population are members of the free e-mail service www.seznam.cz. This service comes with a free e-mail spam filtering service but SOS said this filter is not rated highly.</p> <p>CzeSI is concerned that children can quickly learn how to disable software that is loaded on computers. CzeSI said that</p>

²⁶ <http://www.internetworldstats.com> accessed 29 November 2005

²⁷ Interview. Software602.

²⁸ Interview. Consumers Defence Association of the Czech Republic.

²⁹ Interview. Consumers Defence Association of the Czech Republic.

	<p>while there are some excellent filter software products, many of these are vulnerable to teenagers.</p>
2.1.4 Do stakeholders think the products perform well?	<p>SOS had no comment.</p> <p>CzeSI stated that the filter products that are available do not perform well.</p>
2.1.5 What do consumers require of filters?	<p>SOS had not comment.</p> <p>CzeSI said that filters need to be reliable and easy to use. However, it added that reliable ones tend to be harder, or need more experience, to configure and this means they tend to be harder to use.</p>
2.1.6 Is the product choice too limited?	<p>According to SOS the product choice is far too limited for content and spam filters.</p> <p>CzeSI argue that ISPs should be where filters are applied as this enables people to access the internet from different computers with the same filter configuration. According to CzeSI there is almost no awareness of ICRA.</p>
2.1.7 Are you aware of other projects to help consumers make informed choices?	<p>SOS and CzeSI are not aware of any other initiatives.</p>
2.1.8 Should there be minimum standards?	<p>SOS supports the idea of minimum standards but predicts they would be difficult to develop.</p> <p>CzeSI said that common standards would help it make headway in raising awareness about filters and their role in internet safety.</p>

2.1.9 Market Information

In addition to the free spam filtering service offered by Seznam, several ISPs also offer spam filtering. Some of these add-on services are free while other ISPs charge.

CzeSI said that the product range of filters available in the Czech Republic is similar to that available in other European countries. It said that there are a few Czech products but very little is known about them. Software602 – which is part of the consortium that makes up CzeSI – is developing a software suite that includes content and spam filtering.

2.1 – Poland

Population: 38,130,000

Internet Penetration: 27.8 per cent (well below EU average)³⁰. From 2000 to 2005 the Poland had one of the highest growth rates in internet users in the whole of the EU (278 per cent).

2.1.1 Poland – Summary

The Association of Polish Consumers has surveyed adults on their knowledge of online threats to children. The results show that despite low penetration of internet use, consumers are aware of potential threats to children and ways to minimise the risks. Nearly half of those questioned said paedophilia was the biggest internet threat while nearly 20 per cent said pornography. Just under 40 per cent identified blocking and filtering software as ways parents could protect their children.³¹ The EU Safer Internet Awareness node for Poland (SIT) has launched an extensive awareness campaign that includes the www.sieciaki.pl website aimed at educating children about the internet. Nobody's Children Foundation (which is part of SIT) has tested content filters and states that while these products are useful, they cannot substitute for parental control.³²

<p>2.1.2 What work has been done to assess consumer internet filters?</p>	<p>The Association of Polish Consumers has not carried out any filter testing and its work on campaigning on the issue of internet safety has not included reference to filters.</p> <p>The Polish Nobody's Children Foundation (NCF) is part of the consortium making up the EU Safer Internet Awareness node for Poland (SIT) carried out a detailed test of several filter products in 2003. A test report was not available.</p>
<p>2.1.3 Are there any concerns about the products?</p>	<p>APC made no comment.</p> <p>Through its tests NCF found that filters often made computers perform more slowly. The Foundation also found that the filters often made filtering errors and they were hard to install.</p>

³⁰ <http://www.internetworldstats.com> accessed 29 November 2005

³¹ Interview. Association of Polish Consumers.

³² Interview. Nobody's Children Foundation.

2.1.4 Do stakeholders think the products perform well?	NCF said that filters can be an important tool but are not a substitute for parental involvement.
2.1.5 What do consumers require of filters?	<p>NCF said filters must:</p> <ul style="list-style-type: none"> • block inappropriate sites such as pornography effectively; • be easy to install; and, • be hard for children to disable.
2.1.6 Is the product choice too limited?	NCF made no comment.
2.1.7 Are you aware of other projects to help consumers make informed choices?	
2.1.8 Should there be minimum standards?	NCF made no comment as it will be carrying out more research soon.

2.1.9 Market Information

SIT said that, aside from the filters available online to all EU consumers, there are a few Polish products. However, it had no information on these and information on the products it tested was not made available.

NCF said Polish Telecommunications is providing broadband to all schools and a safety suite that includes a content filter is part of this package called the Panda Platinum Internet Security Platform. NCF has contributed some of the material for that package.

NCF said there is very little awareness of ICRA.

NCF added that barriers to their wider use include lack of awareness about what the filters do and the fact that filters remain expensive for most people in Poland.

2.1 – Belgium

Population: 10,440,000

Internet Penetration: 48.8 per cent (slightly below the EU average)³³

2.1.1 Belgium – Summary

The Belgian consumer organisation has carried out detailed tests on content filters and spam filters. These tests found that very few content filters worked effectively.³⁴ Test-Achats has stressed that the results from the tests reflect the best the products can possibly achieve in test conditions³⁵. Real consumers are likely to see worse performance. The spam filters worked better but only six out of 17 products were recommended³⁶. Child Focus – the European Centre for Missing and Sexually Exploited Children - is part of the consortium making up the EU Safer Internet Awareness node for Belgium (SIB). It said that it is concerned that parents are too reliant on filters to protect children. Its spokesman said there were many ways the filters could be improved³⁷. Another organisation called Action Innocence has carried out detailed tests on content filters. (See section 5).

<p>2.1.2 What work has been done to assess consumer internet filters?</p>	<p>The Belgian consumer organisation Test-Achats has published results of detailed tests on internet content filters in 2002 and spam filters in 2004. See Section 5.</p> <p>The spam filter test found that while none of the 17 products tested were totally effective, some did prevent the bulk of spam messages. See Section 5.</p> <p>Child Focus – the European Centre for Missing and Sexually Exploited Children - is part of the consortium making up the EU Safer Internet Awareness node for Belgium (SIB). It hasn't carried out any testing of internet content filtering. As part of its awareness campaign on internet safety it states that filters cannot be a sole solution because they are not always accurate and they can be disabled by children.</p>
<p>2.1.3 Are there any concerns about the products?</p>	<p>Test-Achats said most of the filters suffer from a cultural bias. This is because they are designed for the US market. Their definition of unsuitable content is not always the same as the Belgian definition. Test-Achats added that it was clear that the</p>

³³ <http://www.internetworldstats.com> accessed 29 November 2005

³⁴ Test-Achats – No. 452 – March 2002. Pages 18-22. Filtrez ce site, que je ne saurais voir...

³⁵ Interview. Test-Achats.

³⁶ Test-Achats – No. 479 – September 2004. Pages 42 – 46. Sus aux spams!

³⁷ Interview. Child Focus.

	<p>filters would work better if there was more cross-checking between them – or if they combined their databases. On spam filters they said that, even though Test-Achats found some products that worked well, this issue cannot be properly tackled without global action.</p> <p>Child Focus said that its main concern is that parents are too reliant on filters to protect their children. The Child Focus spokesman also echoed points made by UK’s Sonia Livingstone (see section 3 and UK Country Profile) that filters can prevent children from seeking help in some way. For example, a filter may prevent a teenager from looking for information on sexuality. Child Focus said children have a privacy right and striking a balance between giving children privacy rights and preventing them from being harmed is a serious problem. They said the only way that balance can be achieved is through parents getting involved in educating their children about internet safety.</p>
<p>2.1.4 Do stakeholders think the products perform well?</p>	<p>Test-Achats said that the test results show that the products do not currently achieve what consumers want. They said that developers base their claims about their products on tests. But, they said that these tests were probably not reliable and that this means the developers may exaggerate how effective the filters are. They also said some of the content filters were hard to maintain.</p> <p>Child Focus said it cannot comment on this as it has not tested filters.</p>
<p>2.1.5 What do consumers require of filters?</p>	<p>Test-Achats stated that the filters do not currently achieve what consumers want.</p> <p>Child Focus said the priority is that filters need to be designed to be consumer friendly. The organisation also said they must:</p> <ul style="list-style-type: none"> • be simple; • easy to install; and, • easy to configure. <p>Child Focus said parents have called Child Focus for help because their children were disabling the internet filter. When</p>

	Child Focus has offered advice it has discovered that the children had installed the filters.
2.1.6 Is the product choice too limited?	<p>Test-Achats said that the product choice is too limited and that identical products are simply marketed under different brand names.</p> <p>Child Focus made no comment.</p>
2.1.7 Are you aware of other projects to help consumers make informed choices?	<p>Test-Achats was not aware of other initiatives.</p> <p>Child Focus said that an organisation called Action Innocence carries out detailed tests on content filters for the Belgian market (http://www.aig-filtra.org/)³⁸. See section 5 for more information on these tests.</p>
2.1.8 Should there be minimum standards?	<p>Test-Achats said that minimum standards would help consumers. They said that one problem may be that if a product is to meet minimum standards for Europe then it may not work properly in the US. They added that cultural differences <i>within</i> Europe may make standards difficult to achieve.</p> <p>Child Focus said minimum standards would solve many problems and would help organisations such as Child Focus offer better advice about filters. It said that any move on standards should cover the whole of Europe.</p>

2.1.9 Market Information

Products listed in the 2002 Test-Achats report included filters developed by:

McAFEE

N2H2 Inc

We-Webcorp.com

One Light Corporation

Solid Oak Software Inc.

³⁸ <http://www.aig-filtra.org/>

Watchsoft Inc.

Visionsoft

Spycatcher Corporation

Symantec

Surfcontrol

S4F (Safe 4 Families) Inc.

Icognito Technologies Ltd

A.Value Systems

Net Nanny Software

Optenet.com

Security Software Systems

8e6 Technologies

Pearl Software

Products listed in the 2004 Altroconsumo report included spam filters developed by:

Cloudmark

Norton

INBoxer

MatterFormMedia

McAFEE

oSpam.com

Sunbelt Software

Giant Company Software

Spamihilator

Edovia Technologies

Surfsecret

Lyris

Spampal

Mailwasher

Spambayes

EMC

High Mountain Software

2.1 – UK

Population: 59,880,00

Internet Penetration: 63.1 per cent (above the EU average)³⁹

2.1.1 UK – Summary

UK's consumer organisation Which? has tested content filters and spam filters for several years and published several detailed reports. It has found that content filters often perform badly and developers do not pay enough attention to ease of use. Which? strongly supports the idea of mandatory minimum standards.

Childnet International is a UK-based international organisation that campaigns to make the internet a safer place for children. It is concerned that many filters may over block sites and that some older children can disable filters.

The author of UK Children Go Online⁴⁰ is concerned that over-blocking may harm the credibility of filters. She is also concerned that the rights of privacy that children have may be eroded if filtering tools are imposed on children. Her research also shows that some children may respond to restrictions by trying to evade filters.

<p>2.1.2 What work has been done to assess consumer internet filters?</p>	<p>The consumer association Which? has carried out a series of tests on content filters and spam filters. The most recent content filter report in September 2005 found that all nine systems tested had problems and did not name any as a 'best buy.' Three were recommended.⁴¹ The most recent spam filter report (in February 2005) found two products to recommend out of nine.⁴² See section 5).</p> <p>Childnet International does not carry out tests on content filters. 43</p>
<p>2.1.3 Are there any concerns about the products?</p>	<p>Which? is particularly concerned about the internet filters that are part of suites. It said that the stand-alone software solutions that it tested in 2005 (see section 4) operated better. Overall, she said the developers do not appear to look at the</p>

³⁹ <http://www.internetworldstats.com> accessed 29 November 2005

⁴⁰ UK Children Go Online. Final Report of Key Project Findings. Sonia Livingstone and Magdalena Bober. April 2005.

⁴¹ Which? September 2005. Parental Control Software.

⁴² Which? Security Software. February 2005.

⁴³ Interview. Childnet.

	<p>products from the point of view of the consumer. Which? is not concerned about the issue of cultural bias.⁴⁴</p> <p>Which? has no specific concerns about spam filters. It said that the software is always one step behind, so a key feature must be how easy the software is to update.</p> <p>Childnet said that filters should make it clear that they are never 100 per cent effective. Childnet, said that the organisation has concerns that the filters may over-block some content and that they may be too easy for older children to disable.</p> <p>The author of UK Children Go Online⁴⁵ said one important concern is over-blocking because this harms the credibility of filters generally. See section 3 for more detail on this.</p> <p>The author also said not enough emphasis is being put on the rights of children to privacy. Children with problems of pregnancy or who are worried about their sexuality may want more freedom to look for information on these issues. Furthermore, internet filtering tools may be used by a parent to monitor a child they are abusing and preventing that child from seeking help.</p> <p>Research shows that children do not welcome restrictions and that 'unwelcome restrictions may lead children to evade parental regulation.'⁴⁶ This shows that a better balance between filtering and privacy is needed.</p> <p>Filters often use poorly designed and badly presented messages to show that a site has been blocked. These messages can sometimes be too heavy-handed and give the impression the child has done something wrong. Many of these screen messages are not appropriate.</p>
2.1.4 Do stakeholders think the products	Which? said its 2005 report focused on ease of use. On this issue the filters don't perform well. Even though the tests looked at only a small number of sites, 'safe' sites were

⁴⁴ Interview. Which?

⁴⁵ UK Children Go Online. Final Report of Key Project Findings. Sonia Livingstone and Magdalena Bober. April 2005.

⁴⁶ UK Children Go Online. Sonia Livingstone and Magdalena Bober. April 2005. Key findings on regulating the internet at home.

perform well?	<p>blocked and inappropriate sites were allowed. However, Which? said that it has concluded that filters are no substitute for parental involvement even though many parents may think they are a quick fix solution.</p> <p>Childnet said that filters do help prevent accidental exposure to inappropriate content. However, the organisation has not carried out specific tests and therefore can't comment.</p> <p>An expert on internet safety works for NCH – a leading UK children's charity. He said many filter products do not perform well and some are almost useless. He is particularly critical of the ICRA scheme. For more detail in this see section 3.⁴⁷</p>
2.1.5 What do consumers require of filters?	<p>Which? said consumer expectations of content filters may be too high. Filters can only work well if they are well maintained.</p> <p>Childnet said content filters should:</p> <ul style="list-style-type: none"> • filter content effectively; • prevent over-blocking; • be easy to use; and, • be easy to understand. <p>They said that one solution may be for ISPs to take more of a lead in offering filtering services like they do in Australia.</p> <p>NCH said filters must:</p> <ul style="list-style-type: none"> • be easy to use and configure; • block age inappropriate material in the way that they claim; and, • stop children unwittingly or knowingly giving other internet users sensitive information.
2.1.6 Is the product choice too limited?	Which? said there were enough products on the market.

⁴⁷ Interview. NCH.

	Childnet said the product choice was not limited.
2.1.7 Are you aware of other projects to help consumers make informed choices?	Which? said it was not aware of other initiatives. Childnet refers parents to the www.getnetwise.org site which allows parents to access information about filter tools.
2.1.8 Should there be minimum standards?	Which? said it would definitely support the introduction of standards as their tests have shown that some filters perform badly. It said that standards would help give consumers confidence when making purchases and it said that the standard should be mandatory via an EU Directive. ⁴⁸ Childnet said it would support the idea of international standards.

2.1.9 Market Information

The Content filters included in the 2005 Which? report on parental control tested the following products⁴⁹:

Net Nanny 5.1

AOL 9.0

Mac OS X Tiger

Cyber Patrol 7

McAfee Internet Security Suite

MSN Premium

Norton Internet Security 2005

The spam filter products included in the Which? report on security software published in February 2005 included:

⁴⁸ Which? Discussion with Roy Brooker. Oct 6, 2005.

⁴⁹ Which? September 2005. Parental Control Software.

Cloudmark SafetyBar

Norton Antispam 2005

In Boxer

Matterform Media SpamFire Pro

McAfee SpamKiller

OSpam.com

Sunbelt Software iHateSpam

Giant Company Software Spam Inspector 4.0

3 Existing work and initiatives

Dozens of national and pan-European initiatives exist on ways to improve internet safety for children and methods to eliminate or reduce the problem of spam. Some of those initiatives focus on consumer internet filtering tools. Some of the most important of those are analysed here. However, very few initiatives exploring the standardisation of filter tools were identified.

3.1 The British Standards Institute Publicly Available Specification 74 – Internet Safety – Access control systems for the protection of children online.

This project represents part of the work undertaken by the UK Home Office Task Force on Child Protection on the Internet. This Task Force is made up by a large coalition of stakeholders. The British Standards Institution (BSI) Publicly Available Specification (PAS) 74 is jointly funded by the Home Office Task Force and UK's Office of Communications (Ofcom). Other organisations are contributing expertise free of charge.

The initiative emerged after the Home Office established a sub-group to look at consumer filtering products. Using public survey research that group found that there was a low awareness of filtering tools and a lack of ability or confidence in their use. The PAS objective is to help consumers through the implementation of an authenticated standard. Developers will be able to choose to have their products tested against that standard and this will help consumers make informed choice.⁵⁰

A 'publicly available specification' is seen by the BSI as a 'step in the process of standardisation.'⁵¹ A PAS is developed more quickly than a normal British Standard but is based on consultation with key stakeholders and consensus. It is hoped that a standard will be available for use in 2006 and the PAS is still undergoing revision through a consultation process.⁵²

Importantly, while the PAS is aimed at the development of filter tools for use in the home, it is hoped that ISPs who provide filters at as server level, and mobile operators providing filtered access to online content, will use the PAS as a guide to good practice. See section 4 on mobile phones.

3.1.1 Content

The current draft of PAS 74 states that the specification will set out a minimum requirement needed for developers of filter products to obtain a third party conformity

⁵⁰ Interview. UK Home Office.

⁵¹ <http://www.bsi-global.com/News/FAQ/PAS.xalter>

⁵² Interview. BSI.

certification. It is intended that when purchasing a certified product parents will have confidence in their ability to:

- protect their children when online (within the limitations of any access control system);
- restrict access to all internet-based services by default and expressly grant access only to those services which they deem suitable;
- restrict communications with all other internet users by default, and expressly grant communication rights with those that they deem suitable;
- obtain timely audit information on access to, and the use made of, internet-based services;
- restrict personal details sent over internet-based services, and protect privacy;
- access suitable system support should they encounter problems with installing, configuring, maintaining or using the access control system.

The PAS also stresses that no filter product is effective 100 per cent of the time and that education about safe internet use is essential. Products that are certified must also, therefore, provide user education materials to support parents in educating themselves and their children on the benefits and risks of the internet.

The PAS specifies requirements on:

- ease of installation, configuration and use;
- effectiveness;
- minimum features;
- effectiveness and ease of updating;
- quality of instructions; and,
- consumer communications and support.

It states that, as a minimum, the following content categories should be filtered by products seeking certification:

- adult (sexually explicit) material;
- violence (including weapons and bombs);

- racist and hate material;
- illegal drug taking or the promotion of illegal drug use;
- criminal skills/activity; and,
- gambling.

The draft currently states that the filter seeking certification should filter a minimum of 90 per cent of inappropriate content but this may be reviewed. It also states that the filter should 'not overblock' internet content. It states that this will be tested through the use of a 'sample' of potentially problematic sites.⁵³

As noted above, the PAS states that it should be possible for the product to filter incoming and outgoing e-mails according to specific categories of content and that access to newsgroups can be filtered. However, this is a contentious issue and the requirement is under review. It also specifies minimum requirements for common service filtering and web-based chat rooms and newsgroups.

In addition, the PAS lays out minimum requirements for privacy controls to protect personal information and security to prevent the product being disabled. To address the issue of ease of use, the PAS also has minimum requirements on installation, configuration, maintenance, support, user documentation and education materials.

Technical assessment

The PAS is still in the review stage and it is likely that some sections such as email control and some aspects addressing the deliberate circumventing of access controls may be modified or dropped. The short time frame for the project and the limited budget has meant some more contentious issues cannot be fully explored.

Although this initiative is considered an encouraging start to a standard and many of the issues involved have been identified, there are significant limitations of the PAS as it stands.

The proposed technical tests are untried. Although loosely based on the experience on Intertek RPT who have undertaken several tests for consumer magazines these were designed for 'comparative testing' of a range of products. A true standard needs an absolute measure of performance. While the proposed methods for the PAS do take this into account to some extent, mainly by increasing the number of test URLs, it is an untried method, which we do not consider a satisfactory situation for a true standard.

⁵³ BSI, PAS 74. Version July 14, 2005.

The PAS recognises that a filter will never be able to guarantee 100% accuracy and so has suggested the results needs to give the user an indication of the performance by using a % rating. In order to do this some statistical treatment of the tests has been suggested, but again, this has not been calculated and piloted.

The way the PAS is to be implemented is for the filter developers or suppliers to apply for a BSI accreditation mark (so called “Kite Mark”). The manufacturer will have to pay for this, which will include the cost of the tests and an annual update. This means a compromise may be required to make the kite mark a success. To make adoption of the kite mark attractive, a balance may have to be reached between the costs of testing and the scope and depth of the tests. While there is general approval of the BSI initiative, there is no evidence from the industry as a whole if they are keen to adopt the kite mark and how much they are willing to pay for it.

The PAS is a UK focussed initiative and so takes no account of the requirements of other European countries, or of cultural diversity in general.

3.1.2 Reaction to PAS 74

Stakeholders consulted for this paper are, on the whole, very positive about the PAS 74 proposal. Industry spokespeople are supportive and say the initiative should improve the credibility of filter products. Some consumer stakeholders are concerned that the proposed minimum performance standard of 90 per cent blocking of inappropriate material is arbitrary and too low. There is significant concern that the PAS pays too little attention to the problem of over-blocking. Furthermore, there is a divergence of views on the rights the child has to information and privacy. The following stakeholders were asked for their views on the project.

An expert on internet safety works for **NCH** – a leading UK children’s charity, and is also a member of the BSI PAS steering group.

NCH agreed with the Home Office view that the PAS will give consumers confidence if it can guarantee a minimum standard of quality. NCH is optimistic that the standard will be put in place and called the initiative a ‘brave experiment.’

Currently the PAS states that products should be able to filter out at least 90 per cent of inappropriate material. Asked about whether this level was too low NCH said that this may not be the level that is finally agreed. They added that, whatever is finally agreed, there must be a rational explanation about why specific performance levels are chosen.

NCH also said that products should also be expected to show the same level of accuracy on over-blocking content. This is because over-blocking can have a serious impact on the credibility of filter products.⁵⁴

The author of **UK Children Go Online** also acted as a consultee to the PAS 74 project.

Overall she was enthusiastic but had some important concerns. Firstly, that the PAS did not put enough emphasis on inappropriate blocking. If filters over-block then the filter loses credibility in the eyes of the child. There is a familiar pattern when a filter over-blocks and the child asks the parent to disable the filter. The parent then forgets to turn the filter back on. This is the reality of family life.

Secondly, she said that the PAS has failed to address the issue of the rights of the child to privacy.⁵⁵ For more detail on her views on privacy see Section 2 – UK Case study.

NetIntelligence – a UK based developer specialising in internet security. This company also markets a home content filter. NetIntelligence is also a BSI PAS 74 consultee.

NetIntelligence welcomes the PAS and the company is not concerned about having its own products assessed and tested. NetIntelligence thinks the industry recognises that a UK standard would improve the credibility of the products. NetIntelligence fully supports the broad content of the PAS, which includes issues such as ease of use.

NetIntelligence had two concerns. Firstly, NetIntelligence currently license out its product to other companies who market the filter under a different brand name. The filter technology is supplied by NetIntelligence. They are not yet aware who should obtain the PAS – NetIntelligence or the other company. Several products are licensed in this way.

Secondly, NetIntelligence does not support the provision in the PAS that the user should be told that filtering is taking place.

Surf Control – a UK based company that make the Cyberpatrol filter is also a member of the PAS steering group.

Surf Control said that the requirement that products should be able to filter out 90 per cent of inappropriate material is a 'line in the sand'. While it may be easy for a company to reach that target for some content categories, it may be a challenge for

⁵⁴ Interview. NCH.

⁵⁵ Interview with author UK Children Go Online. Final Report of Key Project Findings. Sonia Livingstone and Magdalena Bober. April 2005.

some to reach the target in all the categories he said. Surf Control also added that the steering group is still working on the issue of over-blocking.

Surf Control says that the industry is broadly in favour of the PAS.⁵⁶

The Research and Policy Manager at Childnet-International is another consultee on the PAS.

In their responses to the PAS consultation Childnet has stressed the need for the standard to ensure ease of use and good information. Overall, the PAS in its current form makes welcome progress but they cannot be sure the project will help parents until the final version is made available.

3.2 British Educational Communications and Technology Agency (BECTA) Accreditation of Internet Services to Education

This scheme allows UK schools to purchase services from accredited ISPs that meet and maintain specific standards in content filtering and service performance. Services run by ISPs, Local Education Authorities and Regional Broadband Consortia are all eligible for accreditation. The accreditation focuses on internet safety and filtering performance in particular.⁵⁷

The scheme's benefits as outlined by BECTA are:

- that public sector clients are reassured that their requirements from ISPs are met and are constantly monitored by the accreditation body; and,
- that a list of accredited suppliers is available for the public sector clients to choose from.

The scheme is voluntary – ISPs providing or marketing services to the public education sector do not have to seek accreditation.

Accreditation covers issues such as the basics of ISP provision (connectivity and support). However, the internet safety issues included are that 90 per cent of inappropriate content is blocked and the provision of e-mail anonymity. The accredited service must also filter outgoing and incoming e-mails.

⁵⁶ Interview. Surf Control.

⁵⁷ AISE site: <http://ispsafety.ngfl.gov.uk/>

BECTA continually assess the performance of the accredited ISPs through a system of random checking at school premises. BECTA do check that over-blocking is not a significant problem.⁵⁸

Because this scheme covers only the provision of ISP services to public sector clients, its value in informing the debate about standards for consumer products may be limited. However, BECTA said that the scheme does indicate that it is possible to construct an accreditation system for internet services, including content filtering, that purchasers of those services find helpful.

3.3 European Commission Safer Internet Study on Benchmarking of Filtering Software and Services (SIP-BENCH)

In December 2004 the European Commission's Safer Internet Programme issued a call for tenders for this SIP-BENCH study. The deadline for the tender submission was February 2005.

This document highlights the problem of illegal content of the internet and the problems generated by spam e-mail. The European Commission has co-funded 13 projects on improving the reliability of existing content rating and filtering technology⁵⁹ and it said that these projects have improved consumer choice. It states that the second phase of the Safer Internet will 'concentrate on increasing the information available about performance and effectiveness of filtering software and services so that users can exercise choice.'⁶⁰

The purpose of the study is to provide an objective assessment of filtering software and services available and make recommendations for future services. The study is to take three years and focus on filter effectiveness, performance, usability, configurability, transparency, resistance to hacking and other security issues, suitability for European users and new forms of digital content.

The tender document states that while the 'principal orientation of this study is to help with decision making rather than a comparative ranking of products, the Contractor(s) carrying out the benchmarking will take responsibility for its findings and the European Commission will not endorse the specific findings of the project.' It goes on to state that all copyright statements relating to the project must state that the study 'is not aimed at comparing products that might be available in the market, nor at providing any guidance to potential customers regarding the acquisition or otherwise

⁵⁸ Interview. BECTA.

⁵⁹ http://europa.eu.int/information_society/activities/sip/projects/filtering/index_en.htm

⁶⁰ European Commission. Safer Internet – call for tenders for benchmarking of filtering software and services – SIP-BENCH. December 2004.

of those products as such. The study merely tries to **benchmark the main functionalities** [my emphasis] of most currently used filtering software from a technical and 'fit for purpose' point of view, without any commercial or profit-related concern.⁶¹

The document states that the aim of the project is to use a consistently structured and comprehensive scoring approach that should 'allow end-user carers and other target groups to select the most appropriate tool for their individual requirements.' However, as the projects will not attempt to rate products – and compare those ratings - its usefulness as a consumer tool may be open to question.

The services to be tested will include those aimed at individual consumers and those aimed at groups of users such as school networks and libraries. The products tested will include internet content filters and spam filters.

The tests must be performed on a minimum of 12 products that are installed by the client; 10 that are server and/or mixed client/server installation; and, 10 anti-spam products. When the study is complete it must provide:

- ready-to-use, tested and repeatable methodologies;
- comparative data (benchmarks);
- user tests;
- dissemination via the internet of the benchmarks; and,
- recommendations for future products.

The results of the tender process are not known.

3.4 ICRA, ICRA-Plus and QUATRO

The Internet Content Rating Association (ICRA) funded by the European Commission from 2000 to 2001 is the best known European-funded project funded under the filtering and rating part of the Safer Internet initiative among stakeholders.⁶²

The system allows web-based content provider to obtain rating labels that describe their sites. Filters then used by home internet users can then filter out the content

⁶¹ European Commission. Safer Internet – call for tenders for benchmarking of filtering software and services – SIP-BENCH. December 2004.

⁶² http://europa.eu.int/information_society/activities/sip/projects/filtering/index_en.htm

that is unsuitable. The original European funded project aimed to let ‘children explore the Internet to its full potential with restricted exposure to potentially harmful content.’

Although the system is well known to stakeholders, and many of the world’s best known content providers have used the ICRA labels, the country profiles detailed in Section 2 of this report show that the system is largely unknown to consumers. Furthermore, the system is heavily criticised because so few content providers have adopted the labelling system. An expert on internet safety working for NCH – a leading UK children’s charity, argues that if parents allow children to search only for labelled sites then they can access very little, while if they allow wider searches they will access almost everything. He said scheme doesn’t work and is not a solution.

Tests carried out by UK based Intertek RPT (previously Consumers’ Association) confirms that in practise the ICRA ratings system is not a realistic solution.

3.4.1 ICRAplus

ICRA itself admits that not enough content providers have used the voluntary labels. This is why it took part in another European funded project called Solution for Internet Combined Filtering (SIFT)⁶³ and launched ICRAplus. As with ICRA, this system allows users to block access to labelled sites according to their own settings, but it also works with additional filters to block or allow sites whether they are labelled or not. While the basic ICRAplus download is free, the system does mean consumers must install the ICRAplus platform and choose additional filter ‘modules.’

ICRA accepts that the ICRAplus scheme is not yet fully developed as a consumer product. Up to the end of September 80,000 people in total had downloaded the filter system.⁶⁴

3.4.2 Quatro

Even so, ICRA is changing approach once more. Along with eight other consortium partners ICRA was awarded another wave of European Commission funding for the Quality Assurance and Content Description (QUATRO) project. This project aims to help users ‘find what they want, trust what they find and avoid material that, for whatever reason, they choose not to see.’⁶⁵ It hopes to do this through the provision of a common platform to enable the many existing labelling schemes to work to one standard.

Currently there are many labelling schemes in existence – some part-funded by the EU. These schemes allow sites to use labels after going through a review process.

⁶³ http://europa.eu.int/information_society/activities/sip/projects/filtering/sift/index_en.htm

⁶⁴ Interview. ICRA.

⁶⁵ <http://www.icra.org/projects/quatro/>

However, these labels are invisible to search engines and users must already be on a site before he or she can check the validity of the label. The QUATRO scheme will mean that quality labels will be readable by search engines. By doing this it is hoped that the existing labelling schemes will become more useful and new schemes encouraged.

The self-regulation scheme places less emphasis on internet users becoming familiar with, and using, content filters. Instead, it allows users to make decisions about content when browsing search engines. ICRA said that parents do not want to install and maintain filters. One solution may be through a common platform for labelling.

3.4.3 While there will obviously be a need for internet filters for the foreseeable future, the QUATRO project demonstrates that the industry, through self regulation, is also exploring ways to help users navigate away from illegal and harmful material and towards age appropriate material. There are signs that key industry stakeholder are pursuing this labelling strategy vigorously. Segala provides a branded and searchable trustmark that verifies mobile content.⁶⁶ It is also a founding member of the W3C Mobile Web Initiative – which aims to make access to the web as simple and convenient as it is from desktop computers.⁶⁷ Segala has recently announced that the mobile network operator O2 has adopted the Segala system. Furthermore, Segala has agreed to adopt the Quatro system to make its accessibility trustmark ‘machine’ readable.

To make the system workable so that people can search and identify useful material while avoiding inappropriate content (personalised searching as ICRA calls it⁶⁸) still depends on enough content providers adopting the self-labelling schemes.

3.5 Joint Research Centre Benchmarking Project

In 2001 the Joint Research Centre in Italy published its report *Benchmarking of Filtering Software and Services – An Analysis Framework*⁶⁹. The study was established to develop a benchmarking process. It was hoped that this would improve awareness of the capabilities and limitations of filtering software.

The study identified the following “assessment areas”

- Blocking effectiveness
- Over-blocking sensitivity

⁶⁶ <http://www.segalamtest.com>

⁶⁷ <http://www.w3.org/Mobile/#waDI>

⁶⁸ http://www.quatro-project.org/quatro_segala.htm

⁶⁹ Tom Jackson et al. *Benchmarking of filtering software and services – an analysis framework*. February 12th, 2001.

- Security integrity
- Operational integrity
- Configurability
- Customisability
- Usability

Commenting on the traditional test methods for the performance of the URL filter it concluded

“Testing of the software on an arbitrary list of URL’s can provide some qualitative feel for the relative performance of the tools, but it is not a specific measure that can be used in a standardised benchmarking process. Also, the use of a small test set (relative to the number of available web sites) does not preclude the possibility of the test set being inadvertently biased in favour of the URL blocking lists of one or more of the tools. This could possibly lead to one or more tools having an apparent performance advantage over the others. Consequently, it will be necessary to define a data test set that has broad URL coverage to decrease the statistical possibility of inherent bias towards an individual tool”.

This a significant observation.

The JRC benchmark process led to the development of a benchmark tool for the Evaluation of Filtering Software, which has been adopted by “NetProtect (a project partially funded by the European Commission under the Safer Internet Action Plan). The tool basically compares a filter’s performance for blocking and over-blocking by comparing it to a third party hosted unfiltered source. A technical description is given at: <http://np1.net-protect.org/en/WP4-D4.1-v1.0.pdf>.

4 Internet content through mobiles

4.1 Access to the internet via mobile phones has been possible for several years. However, the development of 3G networks has focused attention on the possibility that all 3G mobile phone users may be able to browse the web in a way that is similar to the experience on a desktop computer. In fact, it is the aim of the W3C Mobile Web Initiative to make that a reality.

Networks are increasingly offering users services that include:

- access to their own content;
- access to content provided by third parties; and,
- open access to the internet.

A recent analysis of the issue of protecting children from harmful content on mobile phones carried out by the European Internet Coregulation Network (EICN)⁷⁰ listed important differences in the way that content is accessed on mobiles compared to PCs. This report found that:

- content access via mobiles is much less likely to be supervised by parents;
- network operators are more likely to offer 'walled garden' or filtered access;
- it is widely expected that users will have to 'opt in' to filtering defaults offered by the networks rather than opt out of them. However, in the UK the reverse is true (see below).
- peer to peer (p2p) content will not be controllable by filters at a network level. Because many handsets are supplied with a digital camera this means that inappropriate pictures may be distributed between users – bypassing any network restrictions.
- as larger bandwidth services are offered more p2p file sharing of content such as films and music is likely to occur.

The EICN report notes that as the network operators represent a bottleneck through which access to the internet can be controlled. In addition, mobiles are much more likely to be owned by a single individual. This means that there is more scope to sell or modify handsets that restrict access to some content.

⁷⁰ Protecting Minors from Exposure to Harmful Content on Mobile Phones. EICN. July 2005.

The report describes a number of policy responses to harmful content via mobile phones.

- In Germany new legislation has established consistent standards for the evaluation of content irrespective of how that content is transmitted. A single supervisory body has been established tasked to protect minors and human dignity.
- In the UK all six mobile networks have adopted a voluntary Code of Practice (see below).
- In Italy the government has helped develop and promote a mobile phone code of practice.

4.2 The EICN conclude that the UK's code is the most detailed and thorough measure designed to deal with the issue of child protection from potentially harmful content. The code states that:

- all content that is unsuitable for under-18s and users will only be able to access this material if they can prove they are aged over 18;
- content will be classified by an independent body;
- chat rooms that under-18s can access are to be moderated; and,
- parents will be able to apply filters to network operators' Internet access service to restrict access to content on individual phones.

Operators have introduced further measures of their own. For example, the network 3 offers access only to a walled garden of rated content.

The EICN recommends that the European Commission and member states should monitor and learn from the codes of practice in place.

4.3 Childnet-International was involved in the development of the UK code of practice as a consultee. They are particularly happy with the provision that users must prove their age in order to access content classified for over-18s. In other words, everyone is assumed to be a child. They are, however, concerned that the filters parents and carers can apply may not be easy enough to use. Information has to be clear and accessible on this. In addition, they are concerned that the filtering available may be different for each operator. They would prefer the networks to adopt a common approach.⁷¹

⁷¹ Interview. Childnet-International.

4.4 An expert on internet safety working for NCH – a leading UK children’s charity, also strongly welcomes the code of practice but he is concerned how the situation will develop. He notes, for example, that children in Japan are now more likely to access the internet via their mobiles than computers. He also said that there is a ‘layer of complexity’ with mobile phones that may develop in a way that is currently poorly understood. He said it may take years before we understand how people – and children in particular – use the internet on their mobiles. For example, he said people will be able to store images on mobiles and the filtering and access restrictions available at a network level will not interfere with p2p transmission.

5 Survey of Testing

5.1 Italy

The Italian consumer organisation Altroconsumo published detailed test results on internet content filters in 2002 and spam filters in 2004.

5.1.1 Altroconsumo Internet Content Filters 2002

- The report compared 18 filters with various features. All filtered website content and most filtered newsgroups, chatrooms and e-mail. However, only a few filtered downloaded files and blocked the entry of personal data.
- Only three filters met Altroconsumo's 'expectations.' The rest were judged mediocre except one that was judged to be very poor.
- Altroconsumo was disappointed to find that most of the products that filtered best were only available in English. Only four were available in Italian.
- Most importantly, while most were good or 'mediocre' at filtering pornography, the majority were poor at filtering sites that contained explosives, information piracy, hate and violence, drugs and religious extremism.
- Most sites did not significantly over-block content. Most were rated 'excellent' on this issue.⁷²

Technical Assessment:

See under Belgium, this report was based on the Belgian (Test-Achats / Intertek) tests which was part of the CISA project.

5.1.2 Altroconsumo Spam Filters 2004

The Altroconsumo analysis of spam filters was published in 2004.

- This compared and tested 16 filter products and found seven performed well overall, with those judged 'excellent' for total effectiveness.
- Five were 'good' and four found to be 'mediocre.'
- Overall the report found that the free products were not among the best. Cloudmark Spamnet V 2.0 was found to be the best tested.⁷³

⁷² A Tighter Linked Network. Altroconsumo, 2004.

Technical Assessment:

This is a very detailed consumer report giving a lot of useful and generally interesting information (including the origin of the word spam). It also checked the compatibility of spam filters using a wide range of email readers and operating systems. It briefly describes the different methods of operation used by spam filters and gives useful advice on how to avoid spam.

A brief description of the test method was given: A series of mailboxes were created (number not specified). 500 messages were sent to the various boxes, 450 of which were spam (it does not say how they created or defined these spam messages). A further 100 spam messages were sent to see if the filter under test was able to 'learn'. We think this may be a thorough test but without more information on how they generated their test spam messages we cannot comment with certainty.

Another interesting statement in the report was "*In Italy it is illegal to send advertising without the consent of the addressee*". Of course this is academic as spam generally comes from outside the law.

See also under Belgium, this report was shared with Test-Achats, Belgium.

5.1.3 Adiconsum Internet Filters 2001

Adiconsum – the Italian Association for Consumers and Environment Protection, is part of the consortium chosen to be the EU Safer Internet awareness node for Italy. It published a detailed test report on internet filters in 2001.

- This analysis of 10 filters was very detailed and rated the products on many factors including technical quality, configuration, ease of installation, structural quality and performance.
- Overall, the analysis found that the products had many drawbacks.
- Most importantly, the test found that all of the filters could be easily disabled by a competent teenager.
- Furthermore, the tests found that the filters were not good at stopping online chat.⁷⁴

⁷³ There's (too much) mail for you. Altroconsumo, 2004.

⁷⁴ Analisi di prodotti di Content Filtering per il progetto Internet Friendly. 2001

Technical Assessment:

This is a straightforward comparative report giving a reasonable amount of detail of each product. No details were given on the test method but the report clearly focussed on usability as well as performance.

5.2 Belgium

The Belgian consumer organisation Test-Achats has published results of detailed tests on internet content filters in 2002 and spam filters in 2004

5.2.1 Test-Achats Internet Content Filters 2002

This report was based on the same testing as carried out for the Altroconsumo report. The results varied only slightly from the Italian ratings because of language issues.

The report on internet content filtering concluded that only three out of 18 products were effective. The others were found to be 'average' or 'appalling'. Test-Achats highlighted a few issues not covered by Altroconsum. For example:

- the instructions were normally written in English; and,
- the fact that the filters were good at blocking pornography, but not weaponry, was blamed on the cultural bias of the US products.

Technical Assessment:

The testing for internet filters for the Belgian and Italian projects described above was carried out at the Consumers' Association Research and Testing (now Intertek RPT) in the UK. The testing was wide ranging and looked at a variety of aspects of the filters. Taking account of all the services and features provided. It also considered ease of use and the ability for the filter to be by-passed. The testing of the filters' performance covered all of the recognised undesirable categories. However, budgetary constraints meant that the number of sites used in the test was limited to a number considered adequate for comparative testing and no statistical analysis was used to determine the repeatability of the results in absolute terms.

5.2.2 Test-Achats Spam Filters 2004

The spam filter test found that while none of the 17 products tested were totally effective, some did prevent the bulk of spam messages. Five products were recommended for PC users and one for Mac users.

Technical Assessment:

See comments above for the Italian report

5.3 UK

The consumer association Which? has carried out a series of tests on content filters and spam filters.

5.3.1 Which? Internet Content Filters 2005

In September 2005 it published a report that focused on the ease of use of content filters.⁷⁵ It found that:

- all nine systems tested had problems and did not name any as a 'best buy' and only three were recommended;
- the 'walled garden' filter that is part of the Apple Mac Tiger operating system was easiest to use;
- two products were given an overall rating of under 50 per cent;
- one of the recommended sites was found to overblock sites including the BBC on certain settings, but it didn't rate the filters separately on overblocking.

Technical Assessment:

The test method used was not described in any detail. All that was said was "We tested how well the sites filtered out a list of 'bad' websites and allowed access to 'good' ones but our main focus was on how easy it was to set up and maintain user accounts, customise usage parameters and monitor your child's internet access". When asked, the Which? spokesperson was reluctant to give any more detail than that in the report.

5.3.2 Which? Security Software 2005

In February 2005 Which? published a report on security software that included a test of nine anti-spam products⁷⁶. It found that:

- two products out of nine were good enough to recommend;
- all of them were given an overall rating of more than 50 per cent; and,

⁷⁵ Which? September 2005. Parental Control Software.

⁷⁶ Which? Security Software. February 2005.

- the two free products were among the lowest rated.

5.3.3 Which? Spam Filters 2004

In January 2004 Which? published a report on two spam filters – Norton AntiSpam 2004 and McAfee SpamKiller 5.0. The report said that these products were powerful but required a fair amount of configuration so that they worked well.⁷⁷ The report found that:

- both blocked around 90 per cent of spam;
- both were fairly easy to use but that SpamKiller had a more complicated interface because it offered more features – such as a password protected blocked e-mail file;
- SpamKiller was rated best because it had more features.

The February 2004 report did not give any details of how the testing was carried out. When asked, the Which? spokesperson was reluctant to give any more detail than that in the report.

5.3.4 Which? Internet Content Filters 2003

In March 2003 Which? published a report comparing three internet content filters: MSN version 8.0, AOL Version 7.0 and Cyber Patrol 6.0.1. Cyber Patrol is a stand-alone software product. The AOL and MSN products were software combined with services accessed via the internet. It found that:

- MSN and AOL were very easy to use;
- MSN performed well when on a setting for young children and AOL worked well for all ages, but the MSN on a setting for teenagers performed poorly as did Cyber Patrol.

Technical Assessment:

The testing for this report was conducted at the Consumers' Association research and Testing Centre (now Intertek RPT). The testing was extensive and tested for blocking performance, over blocking, filtering/blocking of newsgroups, blocking data entry (privacy) and all other features. Extensive ease of use and product descriptions were also carried out. The test regime for these three products was the same as used on previous Which? reports. The number of test sites used was calculated to be sufficient to give useful 'comparative' results. However, the number

⁷⁷ Which? Filter Tops. January 2004.

would not be considered large enough to give an absolute performance rating and no statistical analysis was carried out to measure the variability of the results.

5.3.5 Parents Information Network Internet Filters 2000

In 2000 the Parents Information Network carried out tests on internet filtering software. The organisation did this by asking families to use the filters and then answer detailed surveys.⁷⁸ They were also assessed by PIN to find out how well they blocked content. The study found that:

- performance varied hugely;
- there is no agreed quality standard for performance or support;
- most products did not perform as well as advertised;
- families have to match products carefully to their own needs; and.
- products need to be updated regularly.

Technical Assessment:

This appears to be an extensive test looking at all aspect, but unfortunately it is now very out of date and the web site gives no details of how the tests were carried out

5.4 France

Action Innocence is a non-governmental campaigning organisation that was established in Switzerland in 1999. In 2003 the organisation was set up in France and Belgium. Action Innocence is currently working with the Internet Use Commission (DUI) in France which is attempting to bring together and coordinate initiatives that aim to protect children online. It has launched a website for this project – www.mineurs.fr.

5.4.1 Project Filtra

Action Innocence has organised its own detailed testing of filter products. The project, called Project Filtra, aims to provide regular and objective assessments of current software. The results are published on the www.aig-filtra.org website.

⁷⁸ <http://www.pin.org.uk/filtering/index.htm>

All test filters using a database of 350 sites that are considered harmful. The focus of the test is on pornography blocking.

The filters are assessed for their effectiveness at filtering, their added features and ease of use. The ratings on these elements are weighted. Filtering is 80 per cent of the final score, added features 10 per cent and ease of use 10 per cent. The filters are rated from one to six. The tests found that:

- three products were given a score of 5.5 or higher;
- two products (ICRAplus 1.3.2 and Kindersicherung 2005) were rated 1.5 and 1.6 respectively;
- of the 22 products tested, 16 were found to have improved their ratings since the previous test, two performed worse and four were new;
- 11 were available in French and 11 in German; and,
- seven were given a score lower than four.

Technical Assessment

The test used a relatively small number of test sites (300) with the emphasis on 'adult' content. This is arguably an 'adequate' number of sites for simple comparative testing. A further 50 sites were used to test over-blocking. The report does give a little detail on how the test sites were selected, some being obtained from an American voluntary organisation called Cybersnitch "The World's Most Advanced Internet Crime Reporting System"⁷⁹. No details were given on how the results were analysed or if any statistical analysis of results was used.

The sites comprised:

- 150 sites of soft pornography
- 120 sites of pornography
- 30 sites of hatred, violence.
- 50 false-positive bonds (to test the over-blocking of the software)

Another test of consumer filtering software has been carried out by the French Consumers Institute and was published in May 2004. This was commissioned by the

⁷⁹ <http://www.cybersnitch.net/cybersnitch.htm>

DUI. The test results are available on this site:

<http://delegation.internet.gouv.fr/mineurs/60tab2.htm>

5.5 Other product comparisons

A range of other organisations and publications offer advice about consumer internet filters although objective product comparisons based on testing, such as those described above, appear to be rare.

Several consumer organisations said that consumers in their countries would visit sites such as toptenreviews.com. This is a US site, but it does appear to be a popular source of information for European consumers. This site's current review of internet filters compares 10 filters. Two are given a maximum rating and two are given a rating of only one out of four (one out of four is considered 'fair'). All of them were evaluated for feature set, ease of use, ease of set up and filtering effectiveness.⁸⁰

The same site compares anti-spam software. Only one is given a maximum rating and three are given two out of four. All were evaluated for feature set, ease of use, ease of installation, stability, customisation and effectiveness.⁸¹

The test methods for these product comparisons are not explained. In Europe there are product comparisons such as those found in Webuser magazine. The current internet filter review compares 10 products. One is given a maximum rating of five out of five and five products are given four out of five. The products are rated on features, performance, ease of use and value. The test methods are not explained but it appears that the ratings are based on a product review rather than testing.⁸²

The same site carries a product comparison of anti-spam software. One product is given a maximum rating and all the others are rated at least three out of five. The products are rated on features, performance, ease of use and value. Again, the test methods are not explained but it appears that the ratings are based on a product review rather than testing.⁸³

⁸⁰ <http://internet-filter-review.toptenreviews.com/>

⁸¹ <http://spam-filter-review.toptenreviews.com/>

⁸² http://www.webuser.co.uk/products/Internet_Filtering_207_index.html

⁸³ http://www.webuser.co.uk/products/AntiSpam_598_index.html

6 Consumer requirements

6.1 Consumer organisations, non-governmental organisations and the EU Safer Internet awareness nodes across Europe report a myriad of problems with some filter products. In Italy tests found that some filters were bad at blocking internet chat⁸⁴. In Poland tests found that some filters made computers run more slowly⁸⁵. In field trials carried out in Austria users had serious problems using filters on computers with multiple user accounts.⁸⁶ And, in the UK, filters that are included in software suites have been found to perform very poorly.⁸⁷

However, other problems and issues were often raised by more than one, and often several, of the spokespeople consulted for this report. Because they are key concerns they have been identified as consumer requirements. Consumers themselves have a slightly different range of requirements, usually based on experience of these or similar products. The requirements for internet content filtering are explored below.

There is far less concern about spam filters. Overall, the spam filter products performed better than the internet content filters in the tests identified. Furthermore, the organisations consulted were also much less likely to identify problems with these products. One reason for this may be that ISPs are doing more to tackle the issue of spam and software companies appear to have mastered the art of filtering spam much more quickly than they have for internet content.

6.2 Filters should be ISP based

Organisations in the UK and the Czech Republic among others said that they would like to see more filter services offered by ISPs. This solves a number of problems. Firstly, it is harder for children to disable these filters. Secondly, parents are not required to keep them updated – that is the job of ISP. Thirdly, the filter can be applied to all of the computers in a house that access the internet through that ISP. Lastly, it broadens the availability of filtering.

6.3 Cultural bias

This issue was raised repeatedly. Test-Achats said that most of the filters it tested suffered from a cultural bias. They said that because most are designed in the US, their definition of unsuitable content is not always the same as the Belgian definition⁸⁸. This means that filters allow sites defined as unsuitable in Belgium –

⁸⁴ Interview. Adiconsum.

⁸⁵ Interview. Nobody's Children Foundation.

⁸⁶ Interview. Austrian Institute for Applied Telecommunication.

⁸⁷ Interview. Which?

⁸⁸ Interview. Test-Achats

such as those that contain weaponry. This point was also made by organisations from Sweden, Czech Republic, Italy and Austria. VKI in Austria and the Safer Internet awareness node in Sweden both suggested this problem may partly explain why so few families use filters in those countries. They are seen as US products.

Importantly, Adiconsum in Italy made the point that the issue of cultural bias should be separated from the issue of language. Its spokeswoman said that a product that operates in Italian can still be culturally biased. In other words, companies cannot solve this problem simply by changing the language used by the filter.⁸⁹

6.4 Product Choice

For reasons linked to the issue of cultural bias, many said that the product choice available was too limited. SOS in the Czech Republic said this problem also applied to spam filters.

6.5 The Privacy Rights of Children and Parental Involvement

Not all organisations share the view that filters have a significant role to play in protecting children from online threats. This view is best summed up by the saying in Sweden: 'It is better to build a filter in a child's head than in the computer.'⁹⁰ Like the Swedish Internet Awareness Safety node, several organisations place much more stress on parental involvement and 'source criticism' than on filters. Only 14 per cent of Swedish schools use filters.

The general and dominant view, however, is that while filters cannot substitute for parental involvement in educating children about online risks, filters can play an important role. The two, it is stressed by many, should go hand in hand.

The Swedish Internet Awareness Safety node, however, suggests that filters may do more harm than good if they are not used appropriately. It argues that parents may install a filter and then assume their children are protected. This view isn't confined to Sweden.

The author of UK Children Go Online⁹¹ argues that her research shows that unwelcome restrictions (the inappropriate use of filters) may cause significant problems because children may try to evade the restrictions.

Furthermore, too little attention has been given to the rights of the child to privacy. In many ways, the consequences of a regime that heavily restricts a child's use of the internet have not been fully thought through. For example, children may be stopped

⁸⁹ Interview. Adiconsum.

⁹⁰ Interview. Swedish Media Council.

⁹¹ Interview with author UK Children Go Online. Final Report of Key Project Findings. Sonia Livingstone and Magdalena Bober. April 2005.

from seeking help if they are pregnant or confused about their own sexuality.⁹² This point was echoed by Child Focus. They added that finding the right balance between the privacy rights of the child and prevention of harm is a serious problem.⁹³

6.6 Security

The tests carried out by Adiconsum and published in 2001 found that a teenager could disable all the tested products. Other organisations have also highlighted this vulnerability including the Internet Safety node in the Czech Republic and Child Focus in Belgium.

6.7 Over-blocking

Over-blocking happens when a filter blocks access to a safe site by mistake. This can happen for many reasons but some think that over-blocking is a serious problem that harms the credibility of filters. See Section 3 for views on this.

6.8 Reliability

The credibility of filters can also be harmed if they don't do what they claim they can. The test results from Italy, Belgium and the UK show that many products fall below an acceptable standard. The test results in Belgium and Italy found that the filters were good at blocking pornography, but not good at filtering most other types of potentially harmful material.

6.9 Consumer demands

When asked what consumers actually require from internet filters certain features were consistently mentioned:

- they must be easy to use and install;
- technically easy to understand through better instructions;
- operate in the language used where they are sold;
- be easily configured to adapt to different age groups;
- reliably block age inappropriate material (although it was pointed out that maintaining a filter to be reliable can mean it is more complex to use);
- prevent over-blocking; and,

⁹² Interview with author UK Children Go Online. Final Report of Key Project Findings. Sonia Livingstone and Magdalena Bober. April 2005..

⁹³ Interview. Child Focus.

- must stop children giving out sensitive personal information.

Overall most stress was put on ease of use and filtering performance.

7 Conclusion

There is widespread support for some form of standardisation for internet filtering tools among consumer organisations and other organisations involved in internet safety issues in Europe.

Test results from internet content filter projects have shown considerable variation in the technical capability of the products and in the performance of other variables such as ease of use, security and over blocking. There are no standard test protocols or agreed processes for evaluating this software. Each test project has devised its own test method and evaluation system.

According to stakeholders consulted, standardisation would:

- help consumers avoid the worst products more easily;
- help raise awareness of filters in countries where they are hardly used;
- help non-governmental organisations give advice to families about how best to use the internet safely; and,
- give consumers added confidence.

However, support for standardisation was not unanimous. The Austrian Safer Internet node was not sure minimum standards can solve problems of usability and cultural bias. The Swedish Media Council said that standards would be very difficult to develop because of the cultural differences that exist in Europe. They said that some content deemed acceptable in some countries is labeled as harmful in others.

Even so, the dominant view among those consulted for this paper was that standardisation would help consumers make informed choices. The UK consumer organisation vigorously supports the idea of standardisation and said this should be made mandatory through a European directive.

This paper also shows that in the UK the standards institute is developing a certification scheme that sets out minimum standards for consumer internet content filters and that this scheme has strong support among all stakeholders. The scheme is being driven by negotiation, consultation and consensus. Furthermore, in the UK there is at least one example of an accreditation scheme for filter services in operation. Although this scheme is for ISPs offering services to public sector clients, it does demonstrate that these services can be assessed against defined benchmarks, and that this information is useful to purchasers of the service.