UKCCIS Overblocking Working Group
Final Report
The background and findings of the overblocking working group, convened by and concluded under the auspices of the UK Council for Child Internet Safety, chaired by David Miles of the Family Online Safety Institute. November 2013 - December 2014.
Contents

I. Introduction

II. Working Group Meetings and Deliverables

III. Key Findings
   a. Deployment and Take-Up
   b. ISP Reporting Data
   c. Achievement Against Deliverables

IV. Next Steps

V. Appendices
   a. Supplemental White Papers
      i. Charities
      ii. Interactive Entertainment
   b. Internet Matters Reporting Data
   c. Participating Working Group Organisations
I. Introduction

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

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

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

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

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

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

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

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

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

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

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

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

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

The working group held four meetings total, on the dates of:

- 1st November 2013
- 27th February 2014
- 11th July 2014
- 24th November 2014

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

a. Deployment and Take-Up

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

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

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

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

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

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

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

b. ISP Reporting Data

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

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

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

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

c. Achievement Against Deliverables

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

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

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

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

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

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

4. To examine the possibility of a common set of content classification, reporting and age appropriate network-level filtering standards, the commonality of which may make it easier for industry and charities to craft consistent, easy to understand guidance for families.
VI. Appendices

a. Supplemental White Papers

i. Charities

ii. Interactive Gaming
Impact of internet filtering and overblocking on Charities

Update – February 2015

This paper was written by YouthNet and Brook and presented to the members of the overblocking working group in July 2014. Since then, the group as it was originally constituted has been closed.

Although the group made some progress towards the Prime Minister’s original objective “young people’s continued access to quality education and support.” Brook and YouthNet believe there are still two key areas that need a positive focus.

- A clear communication plan to engage and support the voluntary sector to understand filtering, check their urls through Internet Matters and deal with any unintentional over blocking or concerns from the voluntary sector about access by their beneficiaries
- Deal with the issue of form vs content in order to ensure that educational and quality support is still accessible to young people, whatever form this takes; be this editorial, service communities or games

The original paper from July 2014

YouthNet and Brook are original members of the UKCISS working group that was set up to ensure, in the words of the Prime Minister, “young people’s continued access to quality education and support.”

Our aims are:
- to consider some of the unintended consequences of internet filtering affecting the voluntary sector working with young people and;
- to work with the group to find practical and manageable processes that deal with the overblocking of existing and future charitable services for all beneficiaries.
Outstanding concerns

Confidentiality and the law
Can DCMS confirm that filtering would not contravene the law with regard to young people (including under 16s) accessing confidential health services, international human rights laws or the UN Convention on the Rights of the Child?

How a charity can petition for change in the categorisation
We recognise that overblocking can take a number of forms and the ISPs have addressed some of them.

If a website has been incorrectly categorised and needs to be reviewed and recategorised or a website has been correctly categorised but the account holder wants to access the content anyway, the ISPs have systems in place to resolve these situations.

However, if a website has been correctly categorised but the content is valuable information or support for users that charities believe should not be blocked there is no clear process for the charity to challenge the decision and young people may be missing out on vital content to which they have a right, as a result.

Consistent, straightforward, transparent mechanism for unblocking
There is not yet a standard route for voluntary sector organisations who consider they have been wrongly filtered. Although all ISPs agree that Internet Matters will be the route for charities to check their urls, there is no detail or clarity on the process a charity then takes to seek to challenge blocked content.

As more charities become aware of the impact of filters, this lack of clarity will become more frustrating for the sector, and time consuming for each ISP dealing with individual concerns.

There is a need for a solution which ensures:
 a) A practical, manageable process for charity appeals that does not divert valuable resources within charities away from frontline support.

 b) A clear decision making process about charity content, its categorisation and dealing with appeals by charities that can be applied across all ISPs

 c) Where a decision is about policy, not categorisation (eg what content is considered appropriate to be unfiltered, even if the categorisation is appropriate) who has the responsibility for that decision? At the moment, policy decisions are being made by ISPs or ISP suppliers. We do not believe this is appropriate since decisions will be inconsistent and not necessarily based on expertise and evidence.
Communicating the system to the wider voluntary sector
Until now, the wider voluntary sector has not fully understood the potential impact of whole home filtering on their work with vulnerable communities. The public communications around filtering has focussed on the blocking of pornography and child abuse imagery rather than on the wider filters being implemented which may affect a wide range of voluntary sector, and other, organisations. Without clarity and a clear process for dealing with cases of unblocking, Brook and YouthNet have not been able to proactively engage with the wider voluntary sector and its membership bodies, to enable understanding of the process and what it means to them. Yet, increasingly with headlines such as “Internet filters blocking one in five most-popular websites” there are growing concerns which we are unable to allay due to the ongoing gap in process for the sector, and based upon YouthNet’s own experience.

There is a need for a clear practical process and to communicate this clearly to the wider voluntary sector.

Communicating the system to the user
We believe ISPs can go a step further in enabling account holders to make informed decisions. For example, we believe that parents filtering ‘Social Networking’ are understandably concerned about their children accessing sites such as ask.fm, Twitter and Facebook. Yet, they may not consider that support forums by charities providing vital services and support to children and young people will also be filtered.

We would like account holders to be given more information at the point of decision about what is included in the categories they are filtering. It has been proposed with a number of ISPs to consider a sub filter for those choosing to filter out social media. This could be with an additional box to opt out of “to allow access to moderated support groups provided by charities” or extend to “allow access to moderated support groups provided by charities, such as Childline, YouthNet etc”.

Currently, providers such as YouthNet and Childline offer moderated peer to peer support as a vital part of their services to children and young people which are currently being filtered in the social media category. However, YouthNet and Brook are aware of the increasing development across the youth sector of peer to peer support within their services with two major cancer charities developing online community support for sufferers. These ‘service communities’ are a growing area of support which need to be distinguished from the social networks available.
Emergencies

Many charities are set up to support the most vulnerable at the point of emergency – for example danger of suicide, self harm, abuse or violence. This emergency support is increasingly sought and provided online which may be unintentionally restricted according to householder choice of filtering level.

In these instances, those in need must be able to access support quickly even when the specific site they are looking for is filtered. Failure to provide this support could end in serious harm. There are two ways of doing this – an onscreen message that signposts to a universally unfilterable site or finding a system-wide approach to vital voluntary sector content and services.

Linked to this is the capacity for filters to provide a further method of control to abusers (of children or adults) in households.

Recommendations & actions

1) DCMS to confirm that filtering would not contravene the law (for example NHS Constitution) with regard to young people (including under 16s) accessing confidential health services.

2) The working group to agree:
- One practical, manageable process for charity overblocking appeals that does not divert valuable resources within charities away from frontline support.
- A clear decision making process about charity content, its categorisation and dealing with appeals by charities that can be applied across all ISPs
- A recommendation about who should make policy decisions and on what basis those decisions should be made

3) The Internet Matters campaign expands to the voluntary sector to ensure a clear and well understood process.

4) ISPs to give users more informed choices about the categories and offer expanded sub categories to distinguish between online content and charitable services. With the adoption of the social media category to distinguish ‘service communities’.

5) Make some sites ‘universally unfilterable’

Brook and YouthNet would like ISPs to make a small number of charity support sites unblockable under any circumstances. These would include:
- Childline – to ensure that children who are not safe in the home can still access help
• Thesite.org – to ensure that young people always have a good quality, reliable source of information and support on key issues growing up.
• The Samaritans – to ensure anyone looking for support around suicide is given support
• We would also recommend a domestic violence charity is made unblockable in order to minimise the impact of filters as a form of control within a relationship.

6) That the terms of reference for the working group reflect the diverse needs of the voluntary sector in ensuring young people’s (and other users’) continued access to quality education and support.
ii.

Views on network level filtering from UK games businesses

Summary
UK Interactive Entertainment (Ukie) is the trade body that represents over 200 businesses and organisations involved in the games and interactive entertainment industry in the UK.

This paper lays out the concerns that Ukie has over the network filtering services currently offered by the UK’s main ISPs. Whilst these concerns relate to the games sector, they also apply to other digital content.

We are strongly behind the intention to protect children from inappropriate material online. Our industry has an excellent track record of taking responsibility for protecting children, as evidenced by the PEGI age-rating system which is rightly seen as a standard for other content industries.

However, the approach currently being taken by ISPs holds a risk of unintentionally damaging the large number of websites, many of them for charities and public organisations, which use games as a powerful educational tool; of confusing consumers; and of having consequences for legitimate content online, particularly for the games industry.

The games industry’s main concerns are:
1. The lack of consistency and clarity over the goals of network filtering services
2. The general categorisation of games as being inappropriate, alongside violence, drugs, pornography and self-harm
3. The filtering of content according to the form it takes (eg a game), rather than by the type of content (eg if it is an 18 rated game)
4. Unintended consequences and risks of over-blocking due to the use of network filtering services
5. Lack of transparency about what happens when the games category is selected

Lack of clarity over the goals of network filtering services
When announcing the agreement between the ISPs last year, the Prime Minister called for ISPs to provide parental internet filters to all UK households, to stop children seeing legal adult material.

However, most ISPs seem to have gone far beyond this by also filtering out content that could just be termed as potential ‘distractions’ to children. BT, Sky and Talk Talk seem to have categorised games as a distraction, but there is no real clarity when offering consumers the choice between filtering out distractions and filtering of inappropriate content. While Talk Talk have their ‘Homework time’ section, BT and Sky simply have a blanket category of ‘games’ alongside inappropriate content. Talk Talk also still include ‘games’ as an option under their filters, separately from ‘homework time’ settings.

There also does not appear to be a consistency or clarity in how the ISPs define what is being filtered when the category of games is selected.
For example, BT gives the following explanation of what happens when games is selected as a category, (seeming to filter all games as they are distraction, with no mention of inappropriate content, despite games appearing alongside inappropriate content types): “Sites where the main purpose is relating to computer or other games and game-related publication sites. This includes access to online multiplayer gaming servers.” Yet in its official guidance leaflet BT (misleadingly) states that ‘A lot of the popular games and games websites include adult, inappropriate or other dubious stuff that you don’t want you children to get involved in’. (Actually only 6% of games published have received a PEGI 18 rating – see below).

Sky offers a filter for ‘Online games’, that seems to stray into the blocking of other content, defined as: “Sites related to online gaming except games suitable for children under 13. Please note any online services accessed through a games console when signed in (such as on demand TV) will also be blocked.” (The implementation of this definition appears flawed as both askaboutgames.com – the industry’s safe and sensible gaming advice site - and Ukie’s own site are blocked under this category – see below.)

Lack of clarity could lead to frustration as many parents may recognise the benefits that playing games can offer but just want the choice of stopping their children from playing games with adult content and themes.

**Categorising games as inherently inappropriate content**
BT, Sky and Talk Talk group games alongside other categories such as violence, drugs, self-harm, pornography and gambling. The inclusion of ‘games’ in such a list is deeply troubling to our industry.

Putting all games together in a combined inappropriate content /distraction category without any distinction being made as to rating or even theme (often alongside violence, self-harm and drugs, etc) not only perpetuates the myth that games are bad for you (damaging the image that the games industry has sought to correct over the years) but also does not reflect how consumers experience games, giving them a very blunt tool to control the type of gaming content that they want their children to access.

Having a category of ‘games’ simply does not recognise that games cover as wide a breadth of subjects and content as any other medium. Recent games have addressed issues such as childhood cancer (That Dragon, Cancer), politics (Democracy 3), alcoholism (4am) and history (Civilization).

Like books, films and music, games sometimes tackle adult themes. All the main online game formats and platforms have age ratings, parental controls and other guidance in place to stop the playing of games with content that is not suitable for particular ages. However, the vast majority of games now available on major games platforms are suitable for all ages, with only 6% of all games published being given an 18 PEGI rating (PEGI Annual Report 2013).

There are also many benefits to playing games, such as improving coordination, problem solving and team management, and many games are now increasingly being used to educate young people across a wide range of disciplines.

Many charities recognise the ability of games to engage, particularly with a younger audience. For example Childline has a games section on their website.
Games being filtered by form and not content

Most ISPs give the option of blocking all games, regardless of the content that they contain. As outlined above, this does not recognise the breadth of games that are now being made and also creates a flawed consumer experience that will inevitably lead to unintended -blocking of games and game related sites.

The approach taken by the ISPs, of filtering all games regardless of their content, seems to suggest that, if parents wish to protect their children from adult content, it would be useful simply to block all websites and services related to games. Blocking all such websites and services will do little to prevent children from seeing inappropriate material, whilst causing great harm to thousands of wholly child-appropriate websites, creating a major barrier to trade for our industry.

As well as the commercial impact, this approach could also damage the large number of websites, many of them for charities and public organisations, which use games as a powerful educational tool.

Games seem to have been singled out as a form of content to be entirely blocked and yet this approach does not seem to have been consistently applied. The average child is just as likely to read books or other content, listen to music or watch videos when online, yet books, music and video are not in place as categories alongside ‘games’. And nor should they be as it is the content itself that is filtered to prevent inappropriate content being accessible - rather than potentially blocking every game on the internet.

The effectiveness of filtering by content rather than form has been already been proven by the parental controls that exist on all games consoles. Although there are differences to implementation across devices, the typical focus is to allow parents to prevent the playing of games with certain age ratings. In the UK, this is based on the well-recognised PEGI system, which has age ratings of 3, 7, 12, 16 and 18.

A survey of parents of under-18 year olds conducted in July 2012 found that 92% of parents were aware of these controls, and 36% chose to use them: they have proven to be an effective and flexible option for parents wishing to have additional control over which games their children play.

Further evidence of the effectiveness of filtering by content, rather than form, also seems to be offered by the filtering of inappropriate content being undertaken by the BBFC for the Mobile Network Operators.

Unintended consequences and risks

As a result of all of the above, there are potential unwanted risks to the games sector, wider digital content industries and any other businesses or charities that offer games on their websites. As uptake of the network filtering services increases, a blanket filtering of all games content could start to see these risks multiply – leading to potentially more confusion for consumers and serious commercial implications for games’ businesses and major international technology platforms.

Categorising games as inappropriate content, rather than categorisation of individual games or games or a particular theme or rating type, and sites, makes it possible for the content of an entire industry to be blocked to a significant proportion of UK households.
At a time when the UK Government is helping creative industries flourish, the blunt approach that appears to have been taken to this issue by the ISPs creates an assumption that all games are inappropriate for children amongst parents and could present a significant barrier to trade.

Because of the flaws in the network filtering services that we have outlined above there is already evidence that sites which solely host games that are suitable for all ages are being blocked, often because parents wish to filter inappropriate content and have no alternative.

We know for example that the BBC pages hosting CBEEBIES and CBBC games are being blocked by BT. We also know that, by having the games category selected using Sky’s Shield service, the site that the UK games industry uses to promote and educate parents about safe and sensible gaming, www.askaboutgames.com, is blocked. And further, on the page that consumers see to notify them that this site has been blocked, they are told to visit Internet Matters, which on the games area recommends visiting askaboutgames.com – which they then cannot of course access. Ukie’s own website is also blocked.

This clearly points to flawed systems, applying a crude tool to solve a more sophisticated problem.

We are particularly concerned about any inadvertent blocking of educational games promoting the issues and subject areas that charities tackle. Many of these games can be discovered on sites which are not explicitly labelled as “education” or “charity”, in order to be discovered organically by the young people they are targeted towards.

**Lack of clarity about what happens when the ‘games’ category is selected**

There does not appear to be any reporting on what happens when a consumer clicks on the button to filter out the games categories. Without this, it is impossible to determine the impact of any filtering on the games industry and other related games sites.

The onus is on individual website owners to notify ISPs if they feel they have been incorrectly blocked. However, there is no way for owners to determine whether their website has been blocked by the different ISPs, nor under what category, unless they are told by customers. Furthermore, there is no single place for them to challenge a blocking to all ISPs at once.

There remain other questions about the consistency of approach. For example, does selecting games filter out all games content and access to games services? Do the network filtering services apply key words, such as simply filtering out all sites that contain the word “game” in their URL? Or do they apply DNS level filtering to games services?

A far higher level of transparency is needed, including greater consistency between the ISPs on what should be blocked under different categories, clarity on how the filters actually take effect, and a far simpler system for blocking to be challenged by website owners. These are minimum necessary steps to ensure that any potential unintended consequences are avoided.
**Possible actions**

1. Clarity from the main ISPs about what the goals of network level filtering are (e.g., filtering of inappropriate content or filtering of content that just ‘distracts’)
2. Clarity for consumers if games are being filtered as a distraction rather than inappropriate content
3. To remove the category ‘games’ from being alongside violence, drugs and self-harm and introduce a new category of adult content, possibly across all content
4. Consistency of approach on how the filtering is applied, how the results of filtering are reported and how any challenges form website owners are dealt with
5. To separate out the form of media from the content to make it clear to parents that they can filter games according to the content they contain (perhaps by age ratings)
6. To introduce regular reporting of take up of network filtering services and reports on for example, the number of sites blocked per category
b. Internet Matters Reporting Data

Internet Matters
Overblocking Report June – Sept 2014

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

5% of all emails to internet matters were sent to the report@internetmatters.org

Breakdown of emails received to the ‘report’ email:-

To date no site owners have reported that the ISP’s were blocking their sites. The majority of emails received were unrelated to overblocking. These emails were queries regarding restricted access to personal sites and incidents of personal online abuse.

Over the period there were 800 visits to the contact us page

10,693 visits to the Parental Control Page

Exit points to ISP Parental Controls Pages (number of sessions)
Internet Matters
Overblocking Report Oct 14 – Jan 15

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

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

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

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

Exit points to ISP Parental Controls Pages (number of sessions)
- Virgin, 865
- TalkTalk, 943
- Sky, 1602
- BT, 4283
c. Participating Organisations

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