Parental Internet Controls

Consultation Response Form

The closing date is: 6 September 2012 Your comments must reach us by that date.

The Government is keen to take views from information and communication businesses which are members of the UK Council for Child Internet Safety. It is therefore asking for responses to a slightly shorter timeframe than usual so that the process concludes well in advance of the date by which the internet service provider (ISP) Code of Practice is due to be fully implemented in October 2012, but also allowing a reasonable time for responses.



Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the access to information regimes, primarily the Freedom of Information Act 2000 and the Data Protection Act 1998.

If you want all, or any part, of your response to be treated as confidential, please explain why you consider it to be confidential.

If a request for disclosure of the information you have provided is received, your explanation about why you consider it to be confidential will be taken into account, but no assurance can be given that confidentiality can be maintained. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Department will process your personal data (name and address and any other identifying material) in accordance with the Data Protection Act 1998, and in the majority of circumstances, this will mean that your personal data will not be disclosed to third parties.

Please tick if you want us to keep your response confidential. Reason for confidentiality:		
Name	Will Gardner	
Organisation (if applicab	le) Childnet International	
Address:	Studio 14/15, Brockley Cross Business Centre 96 Endwell Road London	

If your enquiry is related to the policy content of the consultation you can contact the Department by telephone on 0370 000 2288 or by email at: ParentalInternetControls.CONSULTATION@education.gsi.gov.uk

SE4 2PD

If you have a query relating to the consultation process you can contact the CYPFD Team by telephone: 0370 000 2288 or via the Department's 'Contact Us' page.

Section 1: Your details

Please select the category which best describes you as a respondent.

Father	Mother	Grandparent/other family member
Young person under 18	Member of public not described above	Information/communication business
Voluntary and Community Sector	Academic/Researcher	X Other

Please Specify:

Childnet International is a UK-based charity working domestically and internationally to help make the internet a great and safe place for children and young people, alongside enabling them to use interactive technologies safely and responsibly.

Childnet focuses on education, awareness and policy and has developed a number of award-winning educational resources, including the award winning Know IT All range of resources and advice on cyberbullying, designed to help young people and parents assess and manage the risks that they may encounter online. As well as promoting the opportunities that the internet and new technologies offer, Childnet is active in carrying out research and engaging in key policy fora alongside the internet industry and government. Childnet is an original member of the UK Council for Child Internet Safety (UKCCIS) and Childnet's CEO is a member of the UKCCIS Executive Board.

Since January 2011 Childnet has been one of the partners in the UK's new Safer Internet Centre and forms the Awareness Centre within this, focusing on raising awareness amongst parents, carers, teachers, children and young people in staying safe online, achieving this in a number of ways, including through working with stakeholders, developing resources and organising Safer Internet Day in the UK.

If applicable, please confirm the number of children that you have parental responsibility for, and their ages.

Comments:
If you work for information/communication businesses, please specify which sector (e.g. ISP). We will assume you have the authority to represent the views of that business and are not just providing your personal views.
Comments:

Questions in Sections 2 - 4 are directed mainly at parents, and parenting and children's charities. Questions in Section 5 are directed mainly at businesses in the information and communication industries and their trade associations.

Section 2 - What has already been done by the information and communication industries

UKCCIS has been encouraging businesses to develop effective tools to help keep children safe online, including for broadband internet services in the home, mobile phones and other portable internet-enabled devices, public wifi and internet-connected television. The following questions seek your views on how useful these tools are.

1 What existing parental controls on access to the internet and internet-enabled devices do you use to help your children stay safe online? [Please select all that apply]

Blocking particular kinds of content (e.g. sites promoting harmful behaviours, pornography or other age-related material)	Restricting access to a list of chosen safe websites	Using keywords to block (or allow) access
Preventing access to certain internet sites (e.g. social networking sites) at particular times of the day Other (please specify)	Preventing access to particular hardware (e.g. cameras or location identification on mobile phones)	Preventing access to particular applications (e.g. web browsers or social networking apps)

Comments:

Comments:

In all of our Education work with parents and carers, Childnet International discusses and promotes the availability of tools for parents and carers to use in helping to protect their children and young people online. We promote the availability of parental controls and encourage parents and carers to look at using these, with the clear caveat that these tools are a help but not a solution, as the tools are not 100% effective and because there is no substitute for parental involvement.

In addition to the solutions/parental controls outlined above, Childnet's Education Team also talk about ratings – encouraging parents and carers to understand what games ratings mean and how they can be used to help make decisions about what types of content that their children and young people might encounter as a result of playing games. Childnet's Education team also talk with parents and carers about the reporting tools that are provided on services (such as the reporting tools on Facebook) as well as reporting to the relevant bodies such as making reports to the Internet Watch Foundation (IWF) and CEOP. Discussions on filtering also include an overview of time limiting software, and different ways to filter – such as by the ISP and also by tools on the web browser, in addition to sharing tools such as Childnet's family agreement (http://www.digizen.org/digicentral/family-agreement.aspx) which can be used by families in their discussions on what types of internet content that they as a family will agree to look at.

2 Which of the parental controls you selected in Question 1 do you find the most useful? [Please write in space provided]

Comments.		

3 Is there anything that would make it easier for you to use the parental controls already available on the devices and broadband connections you already have? [Please list]

Comments:

We know from our work in schools that parents are very interested in using parental controls. In the Q&A part of our education and outreach sessions with parents, very often we are asked by parents and carers about parental controls and which one is the best, and of course some parents are not aware of the availability of such controls at all and ask us more about how to go about using them. In our work with parents we reiterate that filtering solutions are not a silver bullet to the problem of harmful content on the internet, and that they are only part of the solution, although they may be an important part of the equation. Rather than recommend a specific filtering solution, we encourage parents to contact their service providers, their ISPs or mobile operators, and look at the devices too, and to think about the needs of the computer users in their house and use a filtering solution that will best meet their needs.

There is some important research in this area. Ofcom (UK, 2011) found 23% of parents had concerns around content their child might access. Earlier than this, in **Professor Tanya Byron**'s report for the UK Government in 2010, it was found that parents "top concern is easy access to pornography and inappropriate adult content".

The EU Kids Online II study, (which found that 28% of parents said they blocked or filtered websites) made clear policy recommendations, outlining the importance of the availability and awareness of such tools:

"Technical tools to support blocking, reporting and filtering should also be a cornerstone of industry child protection policy with a need to increase awareness of such mechanisms and to improve their accessibility to aid better take up by parents and children".

The past few years have seen a number of steps which have been taken with a view to remove any obstacles for the successful take up of such parental control tools by parents. We have seen the PAS 74 BSi Kitemark scheme, which was designed to help parents make a choice between the array of parental controls. The Mobile operators provide filters for internet content for free, and often with age verification required to lift the age restricted content bar, and increasingly these content restrictions have been on by default.

Active choice, which came out of the 2011 Bailey Review of the commercialisation and sexualisation of childhood, was the next very welcome step in this journey. Bailey urged industry to "Make it easier for parents to block adult and age-restricted material from the internet: To provide a

consistent level of protection across all media, as a matter of urgency, the internet industry should ensure that customers must make an active choice over what sort of content they want to allow their children to access. To facilitate this, the internet industry must act decisively to develop and introduce effective parental controls, with Government regulation if voluntary action is not forthcoming within a reasonable timescale. In addition, those providing content which is age-restricted, whether by law or company policy, should seek robust means of age verification as well as making it easy for parents to block underage access."

Following this recommendation, the 4 Big ISPs in the UK developed and signed up to a Code of Practice in Oct 2011. In this, they committed to provide parental controls for free to their customers, and force customers to make an Active Choice about whether they would like to activate parental controls when they sign up. There was also a commitment to raise awareness of these controls.

We believe that active choice is a welcome step in making it easier for parents to use parental controls, and also the next logical step. This is something that ISPs have been working towards, and something that we believe will result in meaningful help for parents, making it clearer to them what tools they can apply and also giving them a sense of ownership as they choose to apply the tools. Active Choice succeeds in making sure that customers are made aware of the parental controls that are available to them.

Since meeting this commitment, TalkTalk have already seen one in three new customers activate parental controls, and when surveying some of these new customers, they found that 80% felt that being offered an upfront choice was a good thing and over 60% said that they wouldn't have activated the controls if they hadn't been asked to make a choice.

Ofcom's 2011 report revealed that four in ten parents of 5-15s had controls set, or software loaded, to stop their child viewing certain types of website. Those parents who did not have internet controls or filtering software gave a variety of reasons, with 49% of parents of 5-7s saying it was because their child is normally supervised, and 64% of parents of 12-15s saying they trusted their child to be responsible.

However, around one in ten (12%) of parents did not use internet settings or filtering software, either because they didn't know how to activate them, or were not aware that they existed. These are the parents for whom 'active choice' will make a crucial difference. The prompt from ISPs to activate controls will be a real help in raising awareness and improving take up.

Childnet also believe that when parents make an Active Choice it has to be an informed choice, and there needs to be a significant awareness drive to help inform parents and carers about the choices they can make. Indeed, Active

Choice provides, with its introduction in October, a significant moment to have such a big awareness-raising drive.

4 Did you know that the four main internet service providers, BT, TalkTalk, Virgin Media and Sky, have signed up to a code of practice which says that they will:

- Provide parental controls free of charge
- Provide all new customers with an enforced choice of whether or not to use parental controls
- Improve the communication of information to parents explaining the benefits of parental controls
- Align the information they provide to parents so it is all consistent (i.e.
 information from BT will be consistent with information from TalkTalk, and
 so on)

Y Vac	No	Not Sure
V 162		I NOT Oure

Comments:

Childnet is aware of the Code of Practice on Parental Controls, and helped feed into the drafting of the document.

The code extends beyond providing parents with an Active Choice about whether to use parental controls on their account. This is obviously a very important part of the code, but the code also states that in addition to promoting an Active Choice model, the ISPs will improve the communication of information explaining to parents and carers the benefits of installing parental controls. Regular reminders to customers form part of the Code, and the code also highlights that ISPs will work with other organisations to align the information provided to parents and carers. The commitment to independent review is vital to measure the impact of this provision, and ensuring that it is working effectively.

As the UK Safer Internet Centre we are committed to providing parents and carers with the best information on how to help protect their children and young people online. In December 2011 we launched our parents' technology briefing (http://www.saferinternet.org.uk/advice-and-resources/a-parents-guide). This has been well received by parents in schools across the UK and we continue to be asked questions on these important topics. We have been working with the big 4 ISPs and are working to help to communicate to parents and carers about the tools that they are making available to their customers in fulfilling their commitments in the ISP Code.

It is very important that ISPs continue to work with their stakeholders in making sure that these tools are promoted and explained to users so that they are able to make the most out of them.

5 Is there anything you think should be added to the code of practice, saying what internet service providers should have to do, or anything that should be taken away? [Please write in space provided]

Comments:

Childnet are fully supportive of the ISPs Code. We are encouraged by the ISPs Code of Practice, and support the industry's move to present an active choice about parental controls to all new customers by October 2012, but we want the government to encourage ISPs to go even further over the next year, by agreeing to the following commitments by October 2013:

To offer <u>all existing customers</u> an active choice about whether they would like to activate parental controls. We think that it would be important to ensure that this is extended to all customers, and not to just new customers of a service. In the UK, 78% of households now have home internet access, rising to 91% in households with children. It will increasingly be a smaller proportion of users who are new users, and so making sure that existing customers are given the opportunity to make an active choice to apply online filters to protect their children is an important part of the solution.

To ensure that parental control tools are evaluated by parents, to ensure they meet their needs and help to protect children. It will be particularly helpful for ISPs to speak to those customers who activate parental controls but then choose to remove them. Whichever option is followed, whether it be Active Choice, Active Choice Plus or Opt in, it will need to address the issue of the take up of parental controls by parents and carers. There also lies a challenge to help make sure such tools are continued to be used, as there has historically been issues around de-activation of such controls due to reasons of overblocking or inconvenience. Efficient and effective tools are crucial here.

To continue to develop and improve parental control offerings, perhaps providing parental settings that allow granularity (eg. logins for different family members, choices over which type of content to block) or that allow filtering on all internet-enabled devices connected to the home wifi (eg. TalkTalk's 'HomeSafe' network level filtering).

To continue to educate customers about options for protecting children online.

Section 3 - The role of parents

Parents are used to protecting their children from harm when they are very young, and, as they grow up, teaching them how to be safe as they start to explore the world for themselves. The same principles apply to online safety. The internet is a resource for entertainment and information: but some of this material is suitable only for adults and sometimes the deliberate action of others, such as online bullying ('cyberbullying'), can be harmful.

The following questions seek your views on the role of parents in child internet safety.

6 When it comes to keeping children safe online

Parents have the main responsibility	Businesses have the main responsibility	Parents and X businesses have a shared responsibility
Comments:		
young people safe online.	Indeed, Sonia Livingstor Parents Support Children leads to the best outcom	
	and occasionally staying children's internet use, po	5 5
We know from our daily we to stay safe online. This su sources, including schools wide rage of stakeholders.	upport must come from in and their own children, N	
7 Which of the following typ know for sure that your child		
Alcohol and drugs	Anorexia/bulimia	Bullying
Gambling	Grooming	Personal abuse of social networking

Political or religious radicalisation	Pornography	Self-harm
Sexual messages	Suicide	Violence
Other [please specify]		
Comments:		
Children and young people types of internet content.	e can be and have been e	exposed to all of the above
Childnet's Education Team and in our education work these topics and themes in	in schools across the UK	we address and cover all of
8 Which types of internet co your children? [Tick all that		ur do you think most worries
Alcohol and drugs	Anorexia/bulimia	Bullying
Gambling	Grooming	Personal abuse of social networking sites
Political or religious radicalisation	Pornography	Self-harm
Sexual messages	Suicide	Violence
Other [please specify]		

Comments:	

9 Which of these issues listed in Questions 7 and 8, do you think you need most help protecting your children from online? [Please write in space provided]

Comments:

It is our experience that children and young people need to be equipped to be resilient covering a whole range of different issues. There are technological tools, such as the types of filtering that this discussion document seeks to address that can help in addressing these issues. However, these must be accompanied by education solutions to help young people understand how to deal with exposure to upsetting content and to help parents understand how to support their children.

These include techniques to equip children to know what to do if they encounter upsetting content when they are online, such as switching off the screen on a PC or closing the lid of a laptop when content that upsets them appears, and to go and talk to their parent. We work with very young children as well as children of all ages, and impress upon these children that they should tell their parent or carer or someone they trust if they come across something or someone who makes them feel uncomfortable online.

In our work with parents, we encourage them to engage in dialogue with their child, and to enable their child to feel comfortable talking to them about such experiences, and the importance of listening in a way in which they will not over-react.

It must be stressed that content is only part of the issue, and that any steps taken as a result of this consultation will only deal with some forms of content. User-generated material, and content communicated peer to peer for example are less likely to be covered by the traditional parental control tools.

		owing question safe.	ıs seek <u>y</u>	your views on th	ne wa	ays of helping parents keep
aut sma	oma artpl	itically blocke none or other d	d for yo	ou by your interrou use to access	net s s the	example, pornography) is ervice provider or by the internet and you can later ask blocked websites.
		Yes		No		Not Sure
Co	omm	ents:				
ha gr im thi of ar ar Ol m sh Go th	ave to oups oups terner. In a e other outs outs outs outs outs outs outs outs	o opt-in to rece s as the answe ant to look at would be addres et safety has be addition, internet ner important per mpowered to de tors, who recognished the device, and the be such contrones, and, for a there has rece	eive cert r to help what Req sed – th een add et safety octential eal with. here suc gnised, ne challe ols plac most of ently be	ain types of conding keep safer of Bailey said about it may give riversed, and is so is not solely reduced the person of the big Mobile Cen some confus	tent. on the out see to come lated the onal see for the operation and the operation at the	It has been held up by some e internet. However, it is such a solution and ensure that a false sense of security that thing that others will take care to content issues, and there and children need to be aware of each private nature of the parental supervision, that there is is the case for all Pay as you ators, Contract phones too, around their offering with part in this system.
what (included) about net	ať yo dudii out d	u want your chang pornography rugs, and whet ing sites). The	nildren to y, but al ther and	be able to accoso including thir when you'd like	ess on the second secon	ed some questions about on the computer or other device ke 15-rated films, information m to be able to access social ided for you in advance (no
		Yes		No		Not Sure

Comments:

The strength of this solution is that parents choosing the settings are making an informed decision as to what they think their children and young people should be able to see and access.

Ofcom's 2011 Children and parents: media use and attitudes report revealed that one in ten (12%) of parents did not use internet settings or filtering software, either because they didn't know how to activate them, or were not aware that they existed. Forcing parents and carers to make an active choice would help to deal with the situation where parents were not aware of the existence and availability of such controls.

The ISP Code would provide this for new customers, but we see that such an option would only really be effective if it were to be introduced to all existing customers too.

10 c) A **system that combines (a) and (b),** where you are asked all these wider questions in (b), but where for some obviously harmful content (like pornography), some of the answers are 'ticked' for you in advance, so that if you don't change the setting as you are going through the questions, the content is blocked. You would still be able to change the answer if you wanted to.

A res INUL Suite

Comments:

We believe that a system where parents are required to make an active choice to protect their children, and are offered the strongest default settings and supported with a range of well considered and targeted messages, will offer the best opportunity for parents to make an informed choice as to the protections that they apply for their family.

By the provider setting the choice to the highest default, parents will be offered the highest level of protection that their provider is able to provide. Where the user accepts these settings, they will be actively choosing to apply those specific filters, understanding the scope of the service.

We believe that this will give parents the maximum opportunity to use the tools that will be provided for them.

There are issues that remain unaccounted for in this discussion document, and one that should be mentioned here is current users. It is imperative that **all** users online are offered the opportunity to make an active choice, and it must

be considered how this proposed solution will work for existing customers of companies who are providing filtering tools, and how the tools can be promoted to them and how uptake of these tools can be encouraged. This will be a challenge for ISPs and Childnet believes that education must be part of the solution to in making sure that all users are equipped to make an active choice as to how they protect themselves and their family.		
-	ns like this should be in place for all internet connections t for those with children?	
X All household	s Just households with Children	
	useholds should be given the choice to decide whether is of content that they would choose to filter.	
the very young, the em	ers responsible for more vulnerable children (for example, otionally vulnerable, children with learning difficulties, sible parents) need additional help? [Please specify]	
X Yes	No Not Sure	

Comments:

There needs to be clear education around the provisions that are being offered by service providers for all users. The filtering that is being discussed is not a solution to the problem. It is one step in the process of helping to keep children and young people safe online and there is still a clear role for education. These specific groups outlined in the questions may need targeted advice, and this is something that Childnet has begun to develop and is committed to developing on an ongoing basis. For example, Childnet's SEN hub can be accessed at http://www.childnet.com/kia/sen/.

Section 4 - Education and awareness

Parents cannot properly teach their children to be safe online unless they have an understanding of the online world and what tools and techniques are open to them. Children may also get advice on keeping themselves safe online from other trusted sources: for example, their school. The following questions seek your views on how best to improve internet safety education for parents and children.

13 How do you or your children most like to get information about the safe use of the internet? [Please tick all that apply]

Information sent directly by ISP, mobile phone company or other business	Information in lessons at school	Information from law enforcement bodies like the Child Exploitation and Online Protection Centre (CEOP)
Information from charities like BeatBullying	Information from the TV, newspapers, magazines, news websites	Other [please specify]

Comments:
The EUKids Online II survey of 9-16 year-olds found that 9-16 year olds had received advice on internet safety from teachers, parents and carers and then peers. In terms of other sources of advice, other relatives, then the traditional mass media, then online sources, and others. None of these are mutually exclusive, and children, like parents will look for information from a range of sources, and may come across information from these sources in a variety of ways, and the challenge is there to make the most of all these opportunities and ensure that all children are exposed to these messages.
At Childnet we are very active in schools, and with over 350,000 downloads of our resources last year, and 45,000 downloads of our Safer Internet Day resources, we see this as a great way to reach young people as well as reaching out to parents.
14 Where would you or your children be most likely to get information you can rust about being safe on line? [Please specify]
Comments:

15 In addition to education (for parents, children, those who work with children), what other things can be done to protect children from negative online behaviours such as cyberbullying, sexting and grooming? [Please specify]

Comments:
Section 5 - Questions mainly for businesses
The following questions are for businesses in the information and communication sector and their trade associations. Wherever possible, please give data to support your response.
16 a) What are you as a business/trade association doing to ensure parents have access to a range of simple tools and information? [Please list]
Comments:

16 b) For any products listed above, please say when these will be available in the marketplace? **NB: Any responses to this question will be treated in strict commercial confidence** [Please list]

Comments:			
17 What kinds of online con most commonly seek to bloom			
order of frequency of blocking			11.7
Alcohol and drugs	Anorexia/bulimia		Bullying
			Personal abuse of
Gambling	Grooming	L	social networking sites
Political or		_	-
religious radicalisation	Pornography	L	Self-harm
Sexual messages	Suicide		Violence
Other [please		_	_
specify]			
Comments:			

to take greater responsibility for their safety? [Please write in space provided]
Comments:
19 What current activities with parents and children is your organisation involved with to educate and raise awareness about children's online safety? [Please write in space provided]
Comments:
L

18 What help do parents need to recognise the risks to their children online and

20 How could we better protect those children most at risk of harm on the internet (for example, the very young, the emotionally vulnerable, children with learning difficulties, children without responsible parents)? [Please write in space provided]

Comments:
In addition to education (for parents, children, those who work with children), what other things can be done to protect children from negative online ehaviours such as cyberbullying, inappropriate texting and grooming? [Please write in space provided]
Comments:

22 What is your business or organisation doing to help people understand and address these problems? [Please write in space provided]

Comments:
23 If your company/organisation has committed to delivering active choice
nternet safety solutions, what are the principle features of that solution? NB: Any responses to this question will be treated in strict commercial
confidence. [Please list]
Comments:

24 If you have not committed to delivering active choice, why not? [Please list]

Comments:	
25 a) Is demand for parental controls, whether on internet services, devices, software etc. growing?	
Yes No Not Sure	
Comments:	

25 b) If No, how could demand be encouraged?

Comments:
Oulillicitis.
26 What examples do you have of regulatory best practice, from the UK or other
countries, of online child protection? [Please write in space provided]
obditities, of drilling protection. [1 lease write in space provided]
Comments:

27 What models of regulation are used in other industry sectors that could be used as the basis for an effective regulatory system for the internet industries? [Please write in space provided]

Comments:
28 What would most encourage your organisation to ensure parents are provided with effective parental controls? [Please write in space provided]
Comments:

Thank you for taking the time to let us have your views. We do not intend to acknowledge individual responses unless you place an 'X' in the box below.

Please acknowledge this reply X

Here at the Department for Education we carry out our research on many different topics and consultations. As your views are valuable to us, would it be alright if we were to contact you again from time to time either for research or to send through consultation documents?

All DfE public consultations are required to conform to the following criteria within the Government Code of Practice on Consultation:

Criterion 1: Formal consultation should take place at a stage when there is scope to influence the policy outcome.

Criterion 2: Consultations should normally last for at least 12 weeks with consideration given to longer timescales where feasible and sensible.

Criterion 3: Consultation documents should be clear about the consultation process, what is being proposed, the scope to influence and the expected costs and benefits of the proposals.

Criterion 4: Consultation exercises should be designed to be accessible to, and clearly targeted at, those people the exercise is intended to reach.

Criterion 5: Keeping the burden of consultation to a minimum is essential if consultations are to be effective and if consultees' buy-in to the process is to be obtained.

Criterion 6: Consultation responses should be analysed carefully and clear feedback should be provided to participants following the consultation.

Criterion 7: Officials running consultations should seek guidance in how to run an effective consultation exercise and share what they have learned from the experience.

If you have any comments on how DfE consultations are conducted, please contact Carole Edge, DfE Consultation Co-ordinator, tel: 0370 000 2288 / email: carole.edge@education.gsi.gov.uk

Thank you for taking time to respond to this consultation.

Completed questionnaires and other responses should be sent to the address shown below by 6 September 2012

Send by post to: Public Communications Unit, Department for Education, Area 1C, Castle View House, East Lane, Runcorn WA7 2GJ

Send by e-mail to:

ParentalInternetControls.CONSULTATION@education.gsi.gov.uk