ICRA*fail*

A Lesson For the Future

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1 Introduction

ICRA should have been a success. It had lot of key elements right: widespread industry backing, broad political backing, a descriptive labelling system designed to be culturally neutral that could be interpreted within any given cultural or national paradigm. And yet it failed. Why? This document sets out my answer.

Before going any further I should say immediately that one reason for ICRA's failure must be my own doing. Excepting its CEO and one or two longer-serving board members, I was associated with it for longer than any other individual and it was the focus of my work for more than 8 years. The buck doesn't stop with me, but neither am I going to pass it on.

My motivation for writing and publishing this document is not, as one might suppose, animosity or sour grapes towards my former employer. I have remained silent on the subject of ICRA since being made redundant in 2008 and this is not a "spill the beans" polemic. For a start there are no beans to spill and secondly it would do no one any good, least of all me. No, my motivation is that the idea of ICRA is one that comes back time and time again. I am aware of at least one organisation that is making plans that share many of ICRA's goals and thought processes and I would not be surprised if there were others thinking in the same way now or in the future.

I would be delighted if an international content labelling system could be made to work and I'd very much like to play a part in its development. With that in mind I offer this document as an attempt to warn others about taking the road that ICRA took. It didn't work then and it won't work in future unless lessons are learned.

2 What is ICRA?

There are several organisations that use the acronym ICRA. The one I'm concerned with is the Internet Content Rating Association. It no longer exists as a legal entity but the name and trademarks remain the property of its successor organisation. If you visit what remains of the ICRA website you won't (easily) find a way to generate a label – and the labelling of websites was ICRA's core mission. With this in mind it seems appropriate to talk about it in the past tense.

2.1 Brief History

The history begins in the early 1990s with the setting up of the Recreational Software Advisory Council (RSAC) in the USA which offered a rating system for video games. Initially successful, it was soon supplanted as the leading game rating system in the US by the Entertainment Software Rating Board (ESRB). After a short period of time the rating system was modified and transferred to the then new phenomenon of the Web and RSAC become RSAC*i*. As an aside, this branding style of an uppercase acronym followed by a lower case italicised suffix persisted right until the end of ICRA hence my use of it in the title of this article. RSAC*i* was highly successful in its heyday. It beat a slightly older rival online rating system, Safe Surf, to become the default system shipped with the then brand new Internet Explorer browser. A copy of the RSAC*i* rating system shipped with every copy of IE from version 3 through to version 6 as well as Netscape 4.5 (it had gone by Netscape 6).

By the late 90s, with the dotcom bubble well and truly burst, I believe I'm right in saying that RSAC*i*'s sole staff member was close to winding up the organisation. Meanwhile in Europe, the European Commission was making plans to establish the Safer Internet Programme and staff at the Bertelsmann Stiftung were looking into how they could contribute to the work. The end result was the EU-funded ICRA*safe* project and the establishment of ICRA as a successor organisation to RSAC.

3 ICRA*safe*

My rewording of the objectives of ICRA (and the ICRA*safe* project) is as follows:

1. To create a website labelling system that was neutral and objective based on a series of binary descriptors such as: this website does/does not contain images, depictions or portrayals of bare breasts; this website does/does not contain gambling; and so on.
2. Content providers would label their material voluntarily using the neutral and objective descriptors.
3. The system would be implemented within popular browsers, notably as an update to the Content Advisor function within Internet Explorer (the one that used the old RSAC*i* system).
4. Parents would be able to configure their browser to block or allow content based on those descriptors.
5. Since a list of choices was probably too detailed for a parent, ICRA would work with third parties who would create filtering templates that configured the filter automatically. A parent would be able to go to a trusted third party (examples were child welfare groups, religious bodies etc.) and download a template that was appropriate for their children within the context of their cultural and family values

(The original background and expected benefits of the ICRA*safe* project are in the public domain)

A successful ICRA would establish a direct communication channel from the content provider to the parent with no intermediary to control the flow of information unless the parent themselves chose to use a third party filtering template. Thus it was empowering parents to make a choice and not a form of censorship.

That's not a trivial point. When RSAC*i* and the technical standard it used were first published in the mid 90s there were howls from the American Civil Liberties Union about how this was against the First Amendment to the US Constitution that enshrines the principle of free speech. Later this line of attack was dropped and free speech advocates took a much more positive view of labelling, recognising its openness. An early contribution to this discussion by Danny Weitzner, then of the Centre for Democracy and Technology, now working with the Obama administration, is still available online.

Let's briefly run through that list of objectives and see how well each one was met.

1. The ICRA vocabulary was seen widely as being well thought out and thorough for its day. Even so we didn't rest on our laurels. Just as the nature of online content evolved, so did the vocabulary to describe it. We first revised the vocabulary in 2005 when the technology changed and had a new version ready to go in 2008 when we were due to adopt another technical upgrade. At

the time of writing, all 3 versions are still available online (2000, 2005, 2008). If there's one thing ICRA got right it's the vocabularies. The only substantive and sustained criticism was in the use of the term 'neutral and objective.' Whether one chooses to include a descriptor for, say, offensive language or the promotion of weapons (both of which ICRA did) is itself a value judgement since it makes clear that those are issues of concern. Conversely, the omission of particular terms was equally non-neutral. Therefore the words neutral and objective were duly dropped from text on the website and in our other promotional work.

2. Content providers would label their websites voluntarily. Here's the first point of failure. No: content providers generally won't voluntarily label their site. There are a whole raft of reasons for this that I will come back to.

3. Microsoft never did upgrade Content Advisor. Today it's still the same software in IE8 as was included in IE3. What Microsoft did do was to introduce a comprehensive set of parental controls that go way beyond a simple filter in the browser. A robust, effective filter that covers online content, games, messaging, time restrictions and more - built into the operating system - is something that online safety advocates have long been calling for and they got it with Windows Vista. What was astonishing though was that Microsoft decided to retain Content Advisor in IE . Recognising that the built in RSAC*i* system was now long gone in 2006, they asked us to provide an updated vocabulary file and they even asked us if we knew how Content Advisor worked since no-one who had worked on it was still employed by Microsoft.

This presented a minor problem since we had stopped issuing labels using the format that Content Advisor reads some time previously and Microsoft was not prepared to spend any effort on changing the software. Content Advisor relies on a sliding scale like RSAC*i* whilst ICRA was predicated on Boolean descriptors. So we had to back track a little and derive a scalar labelling vocabulary that we could make work in IE 7 and adapt our labelling engine to issue two different encodings of the label simultaneously. I'll go into more detail on the technical side later but it's that compromise system that shipped with IE 7 and still ships with IE 8. Surely it must go from IE 9 since no one is creating labels for it to read anymore?

4. Very few parents configured their browser to read ICRA labels. In order to use the original ICRA labels, parents would have to install a small file in Content Advisor and go through a rather extensive set up process. It's easy to blame Microsoft for not upgrading Content Advisor as originally planned but, actually I've always felt it was irrelevant to ICRA's failure overall. IE 7 included a full implementation of the Platform for Privacy Preferences (P3P) – another system that relied on content providers adding metadata to their website that would be read in the browser. I bet you've never used that either.

5. Third party filtering templates never materialised. Actually, that's not quite true - there were a very small number. One was produced by the Anti Defamation League, a US organisation that fights anti-Semitism, and another

by an academic who created a template that only filtered out sites that included portrayals of smoking. Bigger organisations wouldn't touch templates with a barge pole. National film classification bodies were incredulous at the idea that they should map their schemes to the ICRA vocabulary. Why? because the template would have their brand name on it. It only took *one* inappropriate site to be allowed through, or one appropriate site to be blocked, for the brand owner to face severe criticism.

The risk that a branded filtering template would allow through an inappropriate site was extremely high so this idea never took off. With the benefit of hindsight this is blindingly obvious.

4 Resistance to Labelling

If members of ICRA staff had a single overriding task it was to get content providers to label their websites. One of the yardsticks used to judge us was how we answered the question: "how many sites are labelled?" We faced this relentlessly and always gave a fairly evasive answer. The line that I and others repeated in various meetings was something like "we're getting around a hundred people using the label generator every day". This was true, but it didn't answer the question – because we never could answer the question fully.

The only way to actually find out how many sites have a particular feature is to crawl the Web and count them. ICRA never had the infrastructure to do this and, at the time, I didn't have the skills to set it up (by the time I did the question had become largely irrelevant). What we did know was that only a fraction of those people who used the label generator ever actually put the label on their site and of those many had removed it within a short space of time afterwards. If pushed we'd say that there were around 100,000 sites in the database. This again was true, but it gave the impression that there were that many labelled sites. There never were. If it ever reached as many as 10,000 I'd be surprised, and even if it had been 100,000 sites or even a million, so what? That's barely a spit in the ocean. It's true that a label on a big site, like Yahoo!, can mean that millions of pages were labelled but that wasn't quite the case either.

An early dive into the technical aspects of labelling is unavoidable here. The original technology, PICS, worked on the idea of a URL prefix. A label could cover all URLs that began with, say, http://www.yahoo.com. So that's the whole of Yahoo labelled? No. Because http://search.yahoo.com isn't covered. Neither is http://uk.yahoo.com and so on.

Purely from a technical point of view there are several problems here.

1. Amateur webmasters have difficulty adding a bit of code to their web pages. Almost everyone creates web pages using a WYSIWYG editor and very few edit the underlying HTML which is what you had to do to add an ICRA label.
2. URL prefixes are not appropriate as a means of grouping content for the purposes of labelling.

These and other limitations were the motivation for devising a new labelling technology but technical problems can be overcome if there is a political imperative so these issues don’t fully account for the failure of ICRA. Ultimately I think the reason why few sites were labelled came down to the lack of a solid answer to the simple question: why bother?

4.1 Unlabelled sites

The problem with a safety system that has a label at one end and a filter at the other is that unlabelled sites can only be treated as a single group, i.e. you either block them all or allow them all. Since the number of labelled sites was very small, blocking all unlabelled sites would effectively shut off most of the Web. Allowing all unlabelled sites means that the majority of material a parent might want to block was freely available to their children.

This is the fundamental problem with label-based filtering and there is no easy answer. During the ICRA*safe* project we talked about a critical mass of websites and the target was to get the top 100 sites labelled. This is a reasonable approach. For all the talk of billions of websites, the vast majority of web traffic goes to remarkably few of them so if the top 100 were indeed labelled, for a lot of people a label-based filter would do a reasonable job. The problem was that we never did persuade the top 100 to label or anything like it.

With so few of the major sites labelled, and therefore label-based filtering systems all-but useless, the question everyone asked was, again, why should I bother?

4.2 Member sites

People would look at ICRA and judge us on a small number of criteria. One of these was the labels found on our member sites. Microsoft's website was labelled with the original RSAC*i* system. This made sense since it was what the filter in their browser read (although the label has gone now). Some of the smaller member companies labelled their site too but the majority of companies that openly supported ICRA as members, the companies that were represented on the board, never labelled their site. If they didn't, why should anyone else?

This was a particularly big stick to beat ICRA with and the issue was discussed at pretty well every board meeting I ever attended. The representative of each company would go away promising to see what they could do internally and one or two did make some progress. I had meetings with senior technical staff at various member companies all of whom said something along the lines that labelling would be possible and they could do it but they'd need to clear it with XYZ first… and that was the last we heard about it. To get a major online brand to add something to their website, even something invisible, is a very high hurdle to overcome and, without wishing to imply any disrespect to the individuals concerned, our board members simply weren't senior enough to get something like that done. One board member worked hard for years to achieve it but by the time she did it was all over.

The lack of labels on member sites was certainly an issue for some people looking at ICRA from the outside, but the biggest by far was the experience of trying to actually use a filter that read ICRA labels.

5 Filtering using ICRA

An obvious way to evaluate ICRA was to install a filter and visit some sites one expects to be allowed and some one expects to be blocked. Exactly how many people tried this is unknowable however the results were always as predictable as they were terrible. One study we did get to hear about was by an organisation that brought in a group of parents and asked them to try the system for themselves. I was invited to come and hear the results of the study in an underground branch of Starbucks – a meeting that is scorched on my memory as one I never want to repeat, however much I liked the people delivering the message.

5.1 ICRA*filter*

The original intention was that ICRA-based filtering would be implemented in the browsers. However, it soon became clear that no such development would take place. Large companies don't operate in a simple linear fashion. There are departments and divisions, each with specific responsibilities, targets and competences. If it's hard for someone in a large company to get their corporate website labelled, getting a new feature into a high profile, massively used product is as close to impossible as can be imagined. It simply isn't the way things work.

Therefore, if there was ever to be a filter that read ICRA labels we would have to develop it ourselves.

The problem was that a small non-profit organisation doesn't have anything like the resources to pay for the development and maintenance of attractive consumer software that is both effective and easy to use. What actually happened was that first one then another member company put up relatively small amounts of money, around £30K each time, for the development and then improvement of what became known as ICRA*filter*. It was nowhere near enough.

I don’t need to labour the point any more except to say that more than one hard drive had to be reformatted after ICRA*filter* had been installed. For the short time we offered it the support e-mail inbox was dominated with people trying to rid themselves of it. Even if it had worked as advertised, the usability was appalling, fatally flawed as it was by the absence of filtering templates. Thus users had to go through a mirror image of the ICRA vocabulary (all 46 terms) deciding whether to allow or block particular content types.

5.2 ICRA*plus*

The next attempt to create a working filter that read ICRA labels was ICRA*plus*. This was the product of an EU-funded project (SIFT) and, on paper, looked very good. Partners included two filtering companies and the idea was that ICRA*plus* was a platform into which filtering modules could be plugged. Each filter would use whatever technique it liked to analyse a URL and this would be sent to the central unit (a modified version of ICRA*filter*) as

an ICRA label. Unlabelled sites were therefore instantly labelled as far as ICRA*plus* was concerned. It was a good idea and it really should have worked. But it didn't.

ICRA*plus* suffered exactly the same problem as ICRA*filter* before it – it simply didn't have the money spent on it that consumer software needs. It suffered from several of the same technical problems that ICRA*filter* had and again, more than one hard drive had to be reformatted to get rid of it. The idea of filtering companies creating easily downloaded versions of their existing filter that would plug in to ICRA*plus* was an ideal that couldn't be realised.

Later, a consortium of key players in the German market (ICRADeutschland) had a political imperative to see ICRA succeed and were prepared to put funds into this. It was in 2005 or 2006 that there was a meeting in Berlin where I argued strongly that their budget should be spent on sorting out the problems with ICRA*plus*. This was against the mood of the meeting which was in favour of building a new filter from scratch. I won the day and we signed a contract to fix the existing software which ended up being better but remained far from satisfactory and was still the cause of serious conflicts on some user machines.

Making that argument may have been a mistake on my part but I am reasonably confident that had I lost and a new filter been created it would have had a different set of problems. There may not have been any technical problems with it at all, but it wouldn't have supported plug-ins in the way ICRA*plus* was designed to do and so would have suffered from the basic problem with label-based filtering of what to do with unlabelled sites.

ICRA*plus* was finally removed from the public domain in December 2007.

6 Trust ICRA labels?

ICRA labels were created by content providers themselves and ICRA did not actively monitor them for accuracy. If someone told us about an inaccurate label we wood try and follow it up but this was actually incredibly rare. One line that I and my former colleagues gave out repeatedly was that there was very little incentive for webmasters to deliberately mislabel. Adult websites do not want children on their site, family-friendly websites do not want to be labelled as anything else.

This is true. The number of deliberately, persistently mislabelled sites was always tiny. However… parents are never going to trust this. Neither will brand owners. Any labelling system MUST make compliance monitoring an active part of its operation.

However, the problem with doing this is that you then become a policeman. Who is to say that a label is accurate or not? Even with the binary descriptors that ICRA had it is not always possible to say that a website does or does not contain a certain feature. How skimpy does a swimsuit have to be before you're showing bare buttocks and/or breasts? Does a national lottery count as gambling? Try as one might to be culturally neutral, the answers to these questions will vary between, say, Reykjavik and Riyadh.

One long-time critic of labelling, Richard Clayton, always argued that labelling could never be accurate. He was very good at proving his point too. The *cause célèbre* was a page on the UK Home Office website that reported on public attitudes to drugs. The text was written in formal report-style English but included verbatim quotes from members of the public which included swearing. Whilst it has always been possible to label pages separately, the vast majority of sites that did label, including the Home Office, simply applied a single label to the whole site. Should they say that the site contained swearing or not? To do so would give a misleading impression of the site. Not to do so would be demonstrably inaccurate.

The 2008 vocabulary (that was never implemented) included a term to cover this: " Content that is not covered by any of the other descriptors in the vocabulary but that may refer to facts, ideas and issues in a way that assumes an adult audience."

7 Technical Standards

This isn't the place to go into technical detail but it's worth recording the various changes that were made in the way we encoded our labels.

RSAC*i* and the original ICRA vocabulary were encoded using a W3C Recommendation called PICS. Developed in the mid 1990s it had many features that we wanted and, as has been noted, was built into Internet Explorer from IE 3 onwards and in Netscape 4. So why change it?

The arguments I advanced at the time were:

1. We were in a technological ghetto. No-one else used PICS.
2. If we want to be successful, we had to give people a positive reason for labelling and that would mean using an encoding mechanism that could carry more metadata than simple child-protection descriptors.
3. We should use a technology for which other people were actively developing tools, reducing our dependency on our own (abysmal) software.

I stand by those arguments without hesitation and the decision to change to a new encoding based on Semantic Web technologies, specifically RDF, was made at the AGM in September in 2004 in Berlin.

A year later we began using something we called RDF-CL (RDF Content Labels). This wasn't a standard in the accepted meaning of the word. It was fully documented and well thought out (largely by an independent expert we hired) and seemed to do what we needed it to do, but it wasn't a standard endorsed by any recognised body. This in itself is not necessarily a killer argument. Robots.txt and RSS are among the widely used 'standards' in use on the Web today that were defined by single organisations (Google in the case of robots.txt) and even individuals (Dave Winer for RSS).

RDF-CL was used in a new EU-funded project we'd just begun, called Quatro (see below), and we quickly found that generic RDF tools could read the label although that claim needs heavy qualification. An RDF-CL label is valid RDF in terms of syntax but in terms of its semantics – its meaning – it's well short of the mark. One point of possible confusion: the RDF-CL documentation is physically hosted on the W3C domain however it is NOT a W3C document. The European host of W3C, ERCIM, was a partner in the Quatro project and it was through this route that the document ended up where it did.

Be that as it may, on 12th July 2005, ICRA stopped issuing PICS labels and began issuing RDF-CL labels. A new module was added to ICRA*plus* that would read the new labels. As far as I am aware, this and the ICRA label tester are the only pieces of software that ever read RDF-CL (and recall that ICRA*plus* was removed from the public domain in December 2007). It worked by – yes – converting the RDF-CL label that used the new vocabulary into a PICS label that used the original vocabulary because that's what ICRA*plus* understood. As discussed above, we did have to back track a little and start issuing PICS labels again for use in IE7 alongside the RDF-CL labels so that

from around the end of 2006 onwards, anyone labelling their site was asked to add not one but two labels.

We recognised from the start that RDF-CL was a partial solution so perhaps it was unwise to move to it then? The break away from the single use, single proponent technology of PICS was a real breath of fresh air, it gave us something very positive to say and showed that we were moving with the times. Politically, if not technically, I believe it was the right thing to do. Perhaps the technically correct thing to have done would have been to stick with PICS until a new, fully recognised standard emerged? Maybe. You can judge for yourself.

What was clear was that we wanted to be using a recognised standard and to get RDF-CL adopted more widely, and for it to become a real part of the Semantic Web technology stack, it needed to be formalised through the W3C process. It was for this reason that ICRA joined W3C and I became active within the standards world. I joined the Mobile Web Best Practices Working Group when it began in June 2006 not particularly to promote online safety but to promote a very different use of labelling: mobileOK.

Getting any new technology standardised is never going to be a quick process. You need to build a community around it and prove the case for its development. The Quatro project formed the nucleus of this (see below) along with parties interested in mobile and accessibility. After much work and deliberation, the end result, the Protocol for Web Description Resources (POWDER) became a W3C Recommendation on 1st September 2009. This was thanks only to the persistent support of organisations other than ICRA as September 2009 was a full year after ICRA was mothballed.

A full member of the Semantic Web technology stack, POWDER has formally superseded PICS as the recommended technology for efficiently describing groups of resources such as all those found on a website. PICS was by no means a deficient technology – there is very little that POWDER can do that PICS can't but there are several key advantages to POWDER as outlined separately.

Had it survived, my plan for ICRA labels encoded in POWDER was to:

- do away with the need for webmasters to add anything to their content since labels would be served directly from ICRA. We could have done this with PICS but never did since it requires a reliable server infrastructure and more technical skill than I had at the time;
- harness the much greater flexibility of POWDER to group resources in ways other than by URL prefix;
- set up a system whereby anyone could label anything so that 'the label' for a given page would be a composite of several labels created by multiple individuals, each with associated reputation scores;
- made it easy to add other metadata as well such as Dublin Core, Creative Commons and more (i.e. give people more positive reasons to label).

Whether this would have worked remains an open question but it gets around several key problems that were faced by the original system.

Establishing a full labelling system using POWDER would require label generation tools and various interfaces to make the data available on the wider Semantic Web. This hasn't been done although I am slowly working on a background project to do this for mobileOK and more. See the i-sieve mobileOK/POWDER generator. Thanks to the availability of many Semantic Web tools and software libraries it's not hard or technically difficult – it just takes time and my time is fully occupied with other things.

8 Quatro

A word about Quatro. The second of two two-year projects co-funded by the EU's Safer Internet Programme ended at the end of September 2009. From ICRA's point of view, the aim of the projects was to extend the number of organisations offering labels and the number of reasons for consumer software companies to make use of the label data in their products. Children aren't the only people that need protection from certain types of content or online activity, we can all benefit from this. There are a large number of organisations around the world that offer seals of approval or professional accreditation to companies and individuals of all kinds. By making these seals of approval, qualifications, trustmarks and other expert recommendations available in a machine-readable format, one that supports automated verification, a datasphere could be established in which ICRA's vocabulary is just one part. This in turn can support a sophisticated personalisation that includes, but far exceeds, basic child protection.

Through the sustained commitment of the other partners the POWDER specs and Quatro project were completed. However, both were severely undermined when ICRA withdrew from both in late 2008 and it is difficult to see today which organisation, if any, can take on the promotional and evangelism role required to see their widespread take-up.

9 Other things ICRA tried

We made various attempts to boost the number of labelled sites over the years. All of them were entered into with enthusiasm but none of them provided the impetus to make a real difference to the labelling rate.

9.1 Offline Form

This was an early attempt to make labelling easy. I created a single standalone web page that had a lot of scripting behind it that allowed labels to be generated on anyone's computer. These days we'd call it a widget or an App.

Although it didn't achieve a boost to labelling numbers, it did achieve a political end in that we could say that it was now possible to generate a label without coming to icra.org and using the regular interface. Therefore it was impossible to know how many labels were being generated. This was true, as was the line that it's perfectly possible for a webmaster to edit a label so that it covers different website. But this didn't, of course, mean that lots of labels were being added without us knowing about it.

9.2 Associate Membership

The ICRA membership comprised companies paying significant sums of money and receiving benefits, primarily a board seat. The idea of Associate Membership was to allow smaller companies and individuals to become a member for just $100/year. In return they were listed on the ICRA website and had a link to their own site. This was conditional on the site being labelled (a condition never imposed on full members as discussed earlier). Aimed primarily at web designers, the idea was to allow them to 'belong' and promote labelling.

This scheme was successful. At its peak we had around 400 Associate Members. That's 400 ICRA supporters? No. There were a tiny number of those. The overwhelming majority of the Associate Members joined for one reason alone: the link from icra.org.

A whole industry has sprung up in recent years: Search Engine Optimisation (SEO). Because labelled sites were always encouraged to link back to icra.org, latterly to a particular page that was an extension of the label tester that showed users what the label said, there were thousands of links to icra.org. Since Google's Page Rank algorithm famously takes a lot of notice of links to a site, the Page Rank for icra.org was very high (7 or 8). Any SEO professional will tell you that a link to your site from a site with a Page Rank that high is worth a lot more than $100/year. That's why we had so many Associate Members.

The problem was that these included a lot of adult sites. They weren't allowed to include inappropriate pictures or language but they could describe what the

site was, use a logo, and so on. After all, ICRA was about free speech on the internet and we were always careful not to pass any value judgements on anything. For a long time you could visit icra.org, look at the Associate Members pages and find links to adult sites. It was only when another online safety organisation got in touch to say that they could not link to us any more so long as we included links to adult sites that the situation changed. I installed what became known as the curtain – a page that asked you to decide which ICRA descriptors you did and did not want to see. Once you went beyond that, only sites that didn't include descriptors you had said you didn't want to see were included in the Associate Membership listing.

End result: the Page Rank for the relevant pages plummeted, the main attraction of the scheme therefore disappeared, and the vast majority of Associate Members didn't renew their membership (and quickly removed their labels).

9.3 Google Custom Search

We were an early user of what is now a common sight on the Web – a customised Google search facility. The idea was that webmasters would see labels associated with Google search results and thus be more inclined to label. This is something any labelling body can easily do and you can see some good examples, particularly in the area of health information. It didn't, however, have any noticeable effect on our labelling rate.

9.4 ICRA*checked*

The final big initiative was aimed at answering the trust question: for a fee we would manually check a site's label and, assuming it was accurate, would add the site to a published database. This was the database we used to power our Google customised search engine. Furthermore we checked the label's presence by automated means once a week and did manual spot checks every so often to ensure continuing veracity.

We did have some takers for this service (which cost $35) and the label tester (the tool webmasters and others could use to test whether they had put the label in place) highlighted the fact that a site was or was not ICRA*checked*.

This was worth doing and could be part of any future system but it is labour intensive – hence the fee.

10 What Can We Learn From Other labelling Initiatives?

10.1 The Adult Industry's RTA Tag

The adult industry, specifically the American adult industry, has long been in supportive of labelling in one form or another. The proportion of adult sites that were labelled was always substantially higher than any other type of site. Although always conducted at arm's length, the relationship between ICRA and the adult industry was always good… until the .xxx debate. This is not the place to discuss the relative merits and demerits of a .xxx top level domain. Suffice it to say that it caused a huge amount of debate with the Free Speech Coalition leading the opposition. The FSC is essentially a lobby group defending the adult industry on the grounds of free speech and at the time it certainly had its work cut out in a hostile political climate dominated by the likes of Karl Rove and George W Bush. What they feared, and what ICRA had always opposed, was mandatory labelling. One of the arguments put forward in favour of .xxx was that it would increase the amount of labelling since any website on the domain would need to be labelled and that this label would also apply to a given content provider's websites on other top level domains. This was seen by many in the adult industry as the thin end of the wedge, a wedge that would soon lead to greater restrictions on the industry and the mandatory hosting of all adult content on .xxx.

The Free Speech Coalition initially argued that since ICRA existed and that many adult sites were already labelled the introduction of .xxx would not advance the situation. However, there was resistance within the adult industry to including a label that gave specific information about the types of content on a given site. For example, the ICRA vocabulary included terms describing the presence or absence of user-generated content and other areas that, in order to be accurate, would make labelling cumbersome in their view. Furthermore, as noted earlier, there is no such thing as a neutral and objective vocabulary.

So, working with Joan Irvine at ASACP, they decided to apply Occam's Razor and came up with a single descriptor that tried to encapsulate a simple sentiment. I paraphrase but it is something like: "This site is for adults. If you're accessing this site, we assume that you are an adult and that you are mature enough to either enjoy our content or choose to go elsewhere without taking any offence." Boil this down and you get "Restricted To Adults."

The Restricted to Adults (RTA) Tag is technically naïve, is not part of any recognised standard, needs to be included on every page of a website and certainly doesn't link in with wider efforts on the Web. Here it is:

<meta name="RATING" content="RTA-5042-1996-1400-1577-RTA" />

Don't try and work out what all those numbers mean, they are purely decorative. Simply saying content="RTA" would have exactly the same

semantics – it just provides a longer string for filters to look for. There is nothing site-specific about the tag, it's exactly the same on all pages that carry it. The value of 'RATING' for the name of the meta tag is very old and has long been deprecated.

And yet it does appear to be rather successful! The RTA website includes a list of filtering products that recognise the label and you can bet that the big classification companies whose services power many consumer products will use the RTA tag as part of their algorithm.

Interestingly RTA offers an RTA Verified service. Like ICRA*checked*, it incurs a small fee – and the terms and conditions are very similar to those used by ICRA.

In summary: RTA is the adult industry's own response to the labelling issue and has enjoyed a great deal of success within that industry and with filtering manufacturers. All parties like its simplicity. Whether that success continues in the changed circumstances of the Obama administration and little prospect of the .xxx top level domain becoming a reality remains to be seen. The key point about it is that RTA was designed by the adult industry to cover their political needs. In that aspect, if no other, it appears to be very effective.

10.2 NSFW

The NSFW idea follows a similar ideology to RTA in that it provides a one-dimensional descriptor that simply says "not safe for work." This has a much greater pedigree in the technical world and can be used in ways more akin to the way that metadata is added to modern Web content i.e. through microformats and/or RDFa (see Tom Morris's page for more). NSFW is a grassroots initiative designed to stop people reading blogs at work inadvertently following links to sites that their boss or colleagues would find inappropriate. It is up to the content owner, that is, the owner of the site from which the links go outwards, to use styling etc. to highlight/hide/warn about links marked as NSFW.

10.3 BBFC & PEGI Online

I should mention both of these initiatives although their aim is a little different from ICRA's. Both PEGI and BBFC are established rating systems that appear on films released in the UK and computer games sold across most of Europe respectively. PEGI has the support of all the game platforms and the major game manufacturers; BBFC – like its counterparts around the world – is the classification system that everyone in Britain grew up with and knows well.

The online schemes are not designed to rate websites, rather to work with websites through which films and games are available to make sure that the rating that each film/game already has is presented to the user. Furthermore users are assured that those ratings are authentic. There is no machine-readable element to any of this except that if you watch a streamed movie or download one from a site in the BBFC online scheme, it will have the

classification 'black screen' at the start which is familiar to all UK cinema goers.

I spoke to people I know and like at both BBFC and PEGI about adding machine-readable labels. Neither took up the option, preferring to 'get the simple system set up first and see how we go.' That done, they both seem more than satisfied.

11 A Parent's View

In theory, a voluntary self-labelling system that, like the Internet itself, crosses cultural boundaries is an attractive idea. From a political and industrial point of view it has several key features: neutrality, parental empowerment and de-centralised decision making. But in whose interests is self-labelling enacted? Not the parents' that's for sure.

As any filtering solutions provider will tell you, the primary market for filters is in corporate networks where staff are prevented from spending time using the internet as a distraction from their work. The number of parents willing to pay for commercial filtering software at home is very small. Many ISPs have gone to great lengths and expense to offer filtered access that very often they can't give away, let alone charge for.

The parental expectation is that the internet is as safe as the television. Concerns vary from country to country but it is issues such as contact (cyber bullying, grooming by paedophiles etc.) and inappropriate communication through social networks that worries parents far more than children coming across pornography (either by mistake or by deliberate action).

Where filters are available, such as on Windows Vista (and now 7), setting them up can be time consuming and simply requires more thought than many parents are prepared, or in some cases able, to give. The view that it is up to someone else, usually the service provider, to keep the internet safe is widespread. I can attest personally that installing filtering software is something I would only do as a parent if the teaching and monitoring I do with my own children were to fail. The only active measure I take in terms of filtering, for now anyway, is to enable Google's Safe Search feature.

In other words, I believe that in a utopian world where all sites were labelled so that label-based filters worked and where one could go to a trusted source for a template that made configuring the software easy – no more than a handful of parents would take the option.

So this again begs the question – why bother?

12 Summary

ICRA tried hard to make self-labelling work. It had both political support and the direct involvement of many of the biggest names in the online world. It tried a variety of initiatives to encourage self-labelling. It had a respected descriptive vocabulary that suited the needs of the entire Western world and much of the rest of it too.

What it never had was a compelling reason why content providers should label their site. In my view the reasons for ICRA's failure can be summarised as follows:

- Effective filtering technology uses a variety of automated classification techniques that have become ever more accurate and efficient. It is this approach that brand owners the world over rely on. Where available, labels may be a data point in that process but the classifier has to work effectively without them too.
- Label-based filtering can only work when a critical mass of sites are labelled. Until then, it's either wholly ineffective or wholly restrictive depending whether you block or allow unlabelled sites.
- Most of ICRA's own members never labelled their site.
- ICRA's demonstration software often caused serious conflicts with other software, sometimes disabling all network connectivity and occasionally requiring hard drives to be reformatted with the loss of all data.
- There is almost no demand for content filtering from parents – they expect others to take care of it.
- Potentially harmful web content is only one part of the online safety problem. Parents who are looking for a solution want one that does a lot more than block out the occasional nude image.
- Specific communities like to use their own ideas rather than someone else's.
- ICRA was too sophisticated and too ambitious. The simple 'adults only' or 'your boss won't like this' approach is attractive to many.

13 Conclusion: Is There a Role for Labelling?

Yes. But as I argued for more than half my time at ICRA, it can't be the model of a label at one end and a filter at the other - I hope we buried that a long time ago. If labels (description resources, metadata, call it what you will) are to be useful then:

1. Labels must cover a wide range of aspects through interoperable trustmarks, declarations of professional qualifications, expert opinions and recommendations. They should balance and complement the wisdom of the crowds. The Quatro projects addressed this and provide a possible infrastructure.
2. They must be subject to continual compliance monitoring. Companies like i-sieve Technologies can help to automate this (full disclosure, i-sieve is my employer).
3. They must provide sufficient data of sufficient quality for consumer software manufacturers and search engines to find value in using it. This requires investment and a revenue model to sustain it.
4. End users must see a benefit in using software that utilises the data. Whether those end users recognise the role of labels is irrelevant. I suggest content personalisation is the key here. Think of location-based services on mobile. Whether the device is getting its location data from GPS, wi-fi hotspots, or phone network masts triangulation doesn't matter to the end user just so long as the device knows where it is and displays relevant content.

Finally, if any new ICRA-like system is ever to succeed it must have a compelling answer to the question that may not be asked out loud but that is never far from people’s minds when asked to label their content: why bother?