



Nominet consultation on raising industry standards

April 2006

Response from the Internet Watch Foundation (IWF)

Internet Watch Foundation

The IWF was formed in 1996 following an agreement between the government, police and the internet service provider industry that a partnership approach was needed to tackle the distribution of child abuse images online.

Essentially the IWF is an independent self or co-regulatory organisation and the only non governmental body authorised to operate a 'hotline' in the UK for the public and IT professionals to report their inadvertent exposure to illegal content on the Internet. We provide a universal 'notice and take down' service to all content service providers in the UK so they can remove potentially illegal content from their servers and we work closely with law enforcement agencies at home and abroad to help them trace offenders who publish indecent images of children being abused online.

Our aim is to minimise the availability of potentially illegal internet content, specifically:

- child abuse images hosted anywhere in the world
- criminally obscene content hosted in the UK
- criminally racist content hosted in the UK

We work in partnership with UK Government Departments such as the Home Office and the Department of Trade and Industry to influence initiatives and programmes developed to combat online abuse. This dialogue goes beyond the UK and Europe, to ensure greater awareness of global issues and responsibilities.

We are funded by the EU, Internet Service Providers (ISPs), Mobile Network Operators, mobile manufacturers, Content Service Providers (CSPs), telecommunications and software companies, search providers and the financial sector.

As a result of these dynamic partnerships just 0.4% of potentially illegal content is apparently hosted in the UK, down from 18% in 1997.

As the number of people using the internet and the diversity of content available continues to grow, the mechanisms for dealing with illegal content must be better known and understood.

In partnership with many organisations, we strive to create continued awareness of the role and purpose of the IWF and aim to foster trust and reassurance in the internet for current and future users.

Nominet supports the IWF by virtue of an annual subscription. IWF advises Nominet of any potentially illegal .uk domain names that are noted by their analysts in the course of their work.



Comments on the consultation document proposals

Our legitimacy to comment is on the basis of 'other interested party' status.

Para 5.2 Accuracy of data

The name and address information provided for the registrant are published on the WHOIS (the domain name look-up service). This means the registrant can quickly and easily check to see whether the information we have is accurate. However, we are aware that some non-business users do not want to publish their address in this way. Therefore, we allow non-business users to opt out from the WHOIS.

Comment: Whilst there might be perfectly good reasons why non business users are allowed to opt out it seems to us that this policy should not be allowed to continue without some safeguards being built in. Trust and confidence amongst Internet users is essential but if anonymity or non disclosure is condoned without users knowing that adequate checks and balances or verification procedures leading to authentication are in place then that trust could be undermined. Registrants should be required to maintain accurate and verifiable details of the domain name holder should an investigation be necessary. From a practical perspective it should be impossible for a domain name holder to be untraceable.

In practice, the registrant information supplied is frequently inaccurate, incomplete, out of date or even nonsensical. There is no obligation for registrars to update records at our request, or if they are aware that details are wrong or have changed. A small number of registrars also abuse the WHOIS opt-out.

Comment: IWF would wish to see registrants being held accountable for inaccurate data and they should be required to carry out appropriate checks to detect false or misleading information before registration is accepted.

8. Simplification of registrar and reseller relationships

Many registrars operate "reseller" programmes. This means that the end customer approaches a company, who then registers the domain name through the registrar. As a result the registrar is one stage removed from the registrant. Our current registrar contract cascades a limited set of responsibilities down to these resellers. In practice, this can be very difficult to manage and can cause confusion for everyone involved. Instead we propose that the reseller should be the responsibility of the registrar.

We propose: *that the registrar contract be changed so that the actions of the reseller are the responsibility of the registrar. This means that if the reseller breaches the registrar contract this places the registrar in breach of the contract.*

Comment: IWF supports this proposal

Questions in section 12

With regard to the questions shown in section 12 of the consultation document IWF would respond as follows to specific questions:

Questions 1, 2, 11, 12, 17 and 19 – IWF say yes in each case.

Question 13 – IWF say yes and propose a mandatory approach.

Peter Robbins QPM
Chief Executive