# **Appropriate Filtering for Education settings**



# May 2023

### **Filtering Provider Checklist Reponses**

Schools (and registered childcare providers) in England and Wales are required "to ensure children are safe from terrorist and extremist material when accessing the internet in school, including by establishing appropriate levels of filtering". Furthermore, it expects that they "assess the risk of [their] children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology". There are a number of self review systems (eg www.360safe.org.uk) that will support a school in assessing their wider online safety policy and practice.

The Department for Education's statutory guidance 'Keeping Children Safe in Education' obliges schools and colleges in England to "ensure appropriate filters and appropriate monitoring systems are in place and regularly review their effectiveness" and they "should be doing all that they reasonably can to limit children's exposure to [Content, Contact, Conduct, Contract] risks from the school's or college's IT system" however, schools will need to "be careful that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding."

By completing all fields and returning to UK Safer Internet Centre (<u>enquiries@saferinternet.org.uk</u>), the aim of this document is to help filtering providers to illustrate to education settings (including Early years, schools and FE) how their particular technology system(s) meets the national defined 'appropriate filtering standards. Fully completed forms will be hosted on the UK Safer Internet Centre website alongside the definitions

| Company / Organisation | Barracuda Networks, Inc.                             |  |
|------------------------|--|--|
| Address                | 3175 Winchester Blvd, Campell, California 95008, USA |  |
| Contact details        | +44 118 338 4600                                     |  |
| Filtering System       | Barracuda Web Security Gateway                       |  |
|                        | Barracuda SecureEdge                                 |  |
|                        | Barracuda CloudGen Firewall                          |  |
| Date of assessment     | March 2024   |  |

It is important to recognise that no filtering systems can be 100% effective and need to be supported with good teaching and learning practice and effective supervision.

System Rating response

| Where a supplier is able to confirm that their service fully meets the issue          |  |
|---|--|
| identified in a specific checklist the appropriate self-certification colour for that |  |
| question is GREEN.  |  |
| Where a supplier is not able to confirm that their service fully meets the issue      |  |
| identified in a specific checklist question the appropriate self-certification colour |  |
| for that question is AMBER.   |  |

## **Illegal Online Content**

Filtering providers should ensure that access to illegal content is blocked, specifically that the filtering providers:

| Aspect   | Rating | Explanation                 |
|--|--------|-----------------------------|
| Are IWF members  |        | Active Member               |
| <ul> <li>and block access to illegal Child Abuse</li> </ul>    |        | Part of the Barracuda Web   |
| Images (by actively implementing the IWF                       |        | Categorization Service      |
| URL list)  |        |                             |
| <ul> <li>Integrate the 'the police assessed list of</li> </ul> |        | Part of the Barracuda Web   |
| unlawful terrorist content, produced on                        |        | Categorization Service      |
| behalf of the Home Office'                                     |        |                             |
| Confirm that filters for illegal content cannot                |        | Filtering and monitoring of |
| be disabled by the school                                      |        | illegal content can only be |
|  |        | disabled with local admin   |
|  |        | rights.                     |

#### **Inappropriate Online Content**

Recognising that no filter can guarantee to be 100% effective, providers should both confirm, and describe how, their system manages the following content

| Content                       | Explanatory notes – Content that:  | Rating | Explanation   |
|-------------------------------|--|--------|---|
| Discrimination                | Promotes the unjust or prejudicial<br>treatment of people on the<br>grounds of race, religion, age, or<br>sex. |        | Webfilter Category "Hate or<br>Slander".<br>Sites promoting aggressive,<br>degrading, or abusive opinions<br>about any section of the<br>population that could be<br>identified by race, religion,<br>gender, age, nationality, physical<br>disability, economic situation,<br>sexual preferences or any other<br>lifestyle choice. |
| Drugs /<br>Substance<br>abuse | displays or promotes the illegal use<br>of drugs or substances   |        | Webfilter Category "Illegal<br>Drugs".<br>Sites that sell illegal/controlled<br>substances, promote substance<br>abuse, or sell related<br>paraphernalia.   |
| Extremism                     | promotes terrorism and terrorist<br>ideologies, violence or intolerance  |        | Webfilter Categories "Terrorism<br>or Extremists".<br>Any site that promotes, instructs,<br>or advocates terrorism or<br>extremism.   |

|  |  | Si<br>de<br>al<br>pe<br>id<br>ge<br>di<br>se   | Vebfilter Categories "Hate or<br>lander".<br>ites promoting aggressive,<br>egrading, or abusive opinions<br>bout any section of the<br>opulation that could be<br>lentified by race, religion,<br>ender, age, nationality, physical<br>isability, economic situation,<br>exual preferences or any other<br>festyle choice. |
|--|--|--|--|
| Gambling   | Enables gambling                             | in<br>Al<br>ar   | Vebfilter Categories "Gambling<br>a Gerneral".<br>Il online and offline gambling,<br>nd sites that promote gambling<br>kills and practice.   |
| Malware / promotes the compromising of<br>Hacking systems including anonymous<br>browsing and other filter bypass<br>tools as well as sites hosting<br>malicious content | ar<br>Ri<br>qu<br>ha<br>in<br>ho<br>to<br>co | Vebfilter Categories "Malware"<br>nd "Hacking or Cracking".<br>esources for the illegal or<br>uestionable use of computer<br>ardware or software are<br>ocluded here. Sites that describe<br>ow to gain unauthorized access<br>o systems and that distribute<br>opyrighted material that has<br>een cracked to bypass licensing. |  |
|  |  | Ci<br>Ri<br>In<br>hi<br>to<br>co   | Vebfilter Categories "Hacking or<br>racking".<br>esources for the illegal or<br>uestionable use of computer<br>ardware or software are<br>ocluded here. Sites that describe<br>ow to gain unauthorized access<br>o systems and that distribute<br>opyrighted material that has<br>een cracked to bypass licensing.         |
| Pornography  | displays sexual acts or explicit<br>images   | Si<br>co<br>te<br>ao   | Vebfilter Category "Adult Porn".<br>ites containing sexually explicit<br>ontent in an image-based or<br>extual form. Any other form of<br>dult/sexually-oriented material<br>also listed here.   |

|                            |  | Additional Subcategories in<br>"Adult Material" are:<br>- Adult Magazines or<br>News<br>- Adult Search or Links<br>- Fetish<br>- Nudity<br>- Sexual Expression<br>- Sexual Services<br>The educational Webfilter                      |
|----------------------------|--|---|
|                            |  | <b>Category "Sex Education"</b> which<br>are sites that discuss sex and<br>sexuality in an informative and<br>non-voyeuristic way can be<br>allowed, blocked, reported or<br>monitored.   |
| Piracy and copyright theft | includes illegal provision of<br>copyrighted material              | Webfilter Category "Piracy &<br>Copyright Theft".   |
|                            |  | Sites that are clearly distributing copyrighted material in violation of the copyrights.  |
| Self Harm                  | promotes or displays deliberate                                    | Webfilter Categories "Self-Harm"<br>and "Violence or Suicide".  |
|                            | self harm (including suicide and eating disorders)                 | Sites that contain examples or<br>promotion of self-harm. This<br>includes suicide, N/A cutting, and<br>advocacy of eating disorders or<br>euthanasia.  |
| Violence                   | Displays or promotes the use of physical force intended to hurt or | Webfilter Category "Violence or<br>Suicide".  |
|                            | kill   | Any site that displays or<br>promotes content related to<br>violence against humans or<br>animals is placed in this category,<br>as are sites that advocate any<br>means of harming oneself such as<br>self-mutilation or euthanasia. |

This list should not be considered an exhaustive list. Please outline how the system manages this content and many other aspects

The Barracuda Web Categorization is a Barracuda Networks website categorization service that organizes domains into content categories (subcategories) which are grouped below by

supercategories. When you create rules that block categories of websites, you can choose a supercategory to block, or you can drill down and block websites at the subcategory level. WCS provides very granular categorization so that you can create fine-grained browsing policies for content, and create granular reports on user browsing activity. In the event that a specific URL is currently not present in the cloud-based database, the service initiates a connection to the destination website and attempts to categorize it based on the observed content. Content such as text, meta-data, links and pages following those links help us to categorize a URL/IP automatically. Once categorized, it is put provisionally into the database and will be reviewed by our categorization team in due course.

Regarding the duration and extent of logfile (Internet history) data retention, providers should outline their retention policy, specifically including the extent to the identification of individuals and the duration to which all data is retained.

In general we support a data retention time of at least 3 months. For longer data retention we recommend the usage of external syslog collectors.

Providers should be clear how their system does not over block access so it does not lead to unreasonable restrictions

Our web-categorisation service allows for fine grained acceptable browsing policies. In addition, some users can be deterred from browsing to content deemed inappropriate by simply providing a "Warn" splash screen, reminding users that their browsing is tracked and logged but not blocked.

#### **Filtering System Features**

How does the filtering system meet the following principles:

| Principle   | Rating | Explanation   |
|---|--------|---|
| <ul> <li>Context appropriate<br/>differentiated filtering, based on<br/>age, vulnerability and risk of<br/>harm – also includes the ability to<br/>vary filtering strength<br/>appropriate for staff</li> </ul>       |        | Users can be grouped in any specifically required way and used in the web filter policies.  |
| <ul> <li>Circumvention – the extent and<br/>ability to identify and manage<br/>technologies and techniques<br/>used to circumvent the system,<br/>specifically VPN, proxy services<br/>and DNS over HTTPS.</li> </ul> |        | The webfilter categories "Remote<br>Proxies", "DoH & DoT" and "VPN"<br>provide the possibility to block web-<br>based policy circumvention attempts. In<br>addition the application control feature<br>can detect and block the usage of VPN<br>apps. |
| <ul> <li>Control – has the ability and ease<br/>of use that allows schools to<br/>control the filter themselves to<br/>permit or deny access to specific<br/>content. Any changes to the</li> </ul>                   |        | On top of the predefined webfilter<br>categories, admins may individual URLs<br>by means of customizable block and<br>allow lists. Furthermore, admins may<br>also define custom categories.  |

| filter system are logged enabling<br>an audit trail that ensure | All changes on the configuration are  |
|---|---|
| transparency and that individuals                               | logged accordingly for audit purposes.  |
| are not able to make unilateral                                 | 30  |
| changes   |   |
| Contextual Content Filters – in                                 | Currently not supported in the Barracuda  |
| addition to URL or IP based                                     | Web Categorisation Microservice but we  |
| filtering, the extent to which                                  | are working on a dedicated Contextual   |
| (http and https) content is                                     | Filter specifically for AI generated  |
| analysed as it is streamed to the                               | content.  |
| user and blocked, this would                                    |   |
| include AI generated content.                                   |   |
| For example, being able to                                      |   |
| contextually analyse text on a                                  |   |
| page and dynamically filter.                                    |   |
| • Filtering Policy – the filtering                              | In general we recommend a whitelist   |
| provider publishes a rationale                                  | approach were everything except   |
| that details their approach to                                  | acceptable web categories and   |
| filtering with classification and                               | domains/URLs are blocked. A full list of  |
| categorisation as well as over                                  | available web filter categories is  |
| blocking  | available here:   |
|   | https://campus.barracuda.com/doc/98216554/                                      |
| Group / Multi-site Management     the ability for deployment of | Barracuda Web Security Gateways can   |
| - the ability for deployment of                                 | be centrally monitored and configured<br>via the Barracuda Cloud Control.       |
| central policy and central                                      | via the Barracuda Cioud Control.  |
| oversight or dashboard  | All Barracuda CloudGen Firewalls can be   |
|   | centrally managed via the Barracuda   |
|   | Control Center.   |
|   |   |
|   | The Barracuda SecureEdge Manager is   |
|   | the cloud-based central management  |
|   | piece that enables admins to easily   |
|   | configure Points-of-Entries (PoEs) and  |
|   | acceptable application usage and web  |
|   | policies.   |
| <ul> <li>Identification - the filtering</li> </ul>              | Our solutions provide full user and group                                       |
| system should have the ability to                               | context via an integration with existing  |
| identify users  | IdP (Identity Provider), Active Directory                                       |
|   | or LDAP systems.  |
| Mobile and App content – mobile                                 | The Barracuda Web Security Gateway,   |
| and app content is often  | the Barracuda CloudGen Firewall as well   |
| delivered in entirely different                                 | as Barracuda SecureEdge provide a   |
| mechanisms from that delivered                                  | strong layer-7 application control to   |
| through a traditional web                                       | detect and enforce the usage of   |
| browser. To what extent does                                    | applications. In conjunction with TLS   |
| the filter system block   | inspection our solutions allow for even   |
| inappropriate content via mobile                                | deeper visibility, inspection and content<br>filtering of woh and non woh based |
| and app technologies (beyond                                    | filtering of web and non-web based  |
| typical web browser delivered content). Providers should be     | applications.   |
| contentj. Providers snould be                                   |   |

| door about the series it of the in  |  |
|---|--|
| clear about the capacity of their   |  |
| filtering system to manage<br>content on mobile and web apps                          |  |
| <ul> <li>Multiple language support – the</li> </ul>                                   | Barracuda Networks has a world-wide  |
| ability for the system to manage  | deployment of filtering solutions and  |
|   |  |
| relevant languages  | intelligence from this global footprint<br>allows us to filter appropriately against |
|   | content in multiple languages.   |
| Network level - filtering should  | Web filtering is provided at the network   |
| be applied at 'network level' ie,   | level.   |
| not reliant on any software on  |  |
| user devices whilst at school   |  |
| (recognising that device  |  |
| configuration/software may be   |  |
| required for filtering beyond the   |  |
| school infrastructure)  |  |
| <ul> <li>Remote devices – with many</li> </ul>  | For the Barracuda Web Security Gateway   |
| children and staff working  | we provide the Web Security Agent that   |
| remotely, the ability for school  | will route the web traffic through the   |
| owned devices to receive the  | Web Security Gateway for further   |
| same or equivalent filtering to   | inspection.  |
| that provided in school   |  |
|   | For the Barracuda CloudGen Firewall as   |
|   | well as Barracuda SecureEdge the   |
|   | SecureEdge Access Agent extends  |
|   | security and policy compliance to any  |
|   | device on any platform.  |
| Reporting mechanism – the   | Reporting of URLs for classification or re-  |
| ability to report inappropriate   | classification can be done via the website   |
| content for access or blocking  | barracudacentral.org or by simply  |
|   | contacting our worldwide support team.   |
| Reports – the system offers clear   | Web logs are stored locally or can be  |
| historical information on the   | streamed via syslog to external collectors   |
| websites users have accessed or   | or Azure Analytics   |
| attempted to access   | CofeCoarch is fully supported With the   |
| <ul> <li>Safe Search – the ability to<br/>enforce 'safe search' when using</li> </ul> | SafeSearch is fully supported. With the<br>Barracuda Network Access Client and the   |
| search engines  | SecureEdge Access Agent it is possible to  |
| search engines  | enforce SafeSearch also for remote and   |
|   | off site users.  |
|   | on site users.   |

Filtering systems are only ever a tool in helping to safeguard children when online and schools have an obligation to "consider how children may be taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum".<sup>1</sup>

Please note below opportunities to support schools (and other settings) in this regard

Web monitoring policies allow administrators to configure the generation events when certain content is searched on the Internet. You can select common categories from a list and also define

<sup>&</sup>lt;sup>1</sup> <u>https://www.gov.uk/government/publications/keeping-children-safe-in-education--2</u>

custom keywords in order to get notified about web content searched by users. As soon as web content defined as monitored is searched for, a notification event is generated and logged, and the admin receives a list containing the search terms looked for. This feature currently supports the following search engines: Google, Yahoo, Bing, YouTube, and DuckDuckGo.

#### **PROVIDER SELF-CERTIFICATION DECLARATION**

In order that schools can be confident regarding the accuracy of the self-certification statements, the supplier confirms:

- that their self-certification responses have been fully and accurately completed by a person or persons who are competent in the relevant fields
- that they will update their self-certification responses promptly when changes to the service or its terms and conditions would result in their existing compliance statement no longer being accurate or complete
- that they will provide any additional information or clarification sought as part of the selfcertification process
- that if at any time, the UK Safer Internet Centre is of the view that any element or elements of a provider's self-certification responses require independent verification, they will agree to that independent verification, supply all necessary clarification requested, meet the associated verification costs, or withdraw their self-certification submission.

| Name      | Markus Lang                                   |  |  |
|-----------|---|--|--|
| Position  | Director Product Management, Network Security |  |  |
| Date      | 16.04.2024                                    |  |  |
| Signature | Markus Lang                                   |  |  |
|           |   |  |  |