

The Features of Restricted Access to Information at European and East Asian Libraries

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ABSTRACT

The growing number of threats to society through the uncontrolled distribution of information is forcing library communities in many countries to reconsider their views on free access to collections. Based on the content of numerous documents of international importance, it can be concluded that in any democratic country access to information is one of the most important human rights, along with the right to life, liberty, and security of person. However, the state has the right to restrict citizens' access to information within the framework of existing legislation. Constantly, restrictions on access to information are established in order to protect the ethical foundations of the constitutional order, morality, health, rights, and legitimate interests of others, to ensure the country's defense and state security. It goes without saying that each country has the right to independently decide where the boundaries lie between permitted and prohibited information, including printed information, contained in library collections. This article describes three levels of access restriction: foreign, state, and regional. The authors have analyzed the legal and regulatory documents that govern libraries, as well as the reasons and methods of limitation. A comparative analysis of the restriction of access to information in the countries of Europe and Asia is presented.

Keywords: restricted access to information, restricted collections in libraries, censorship, *spetsshran*

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1. INTRODUCTION: RESTRICTED ACCESS TO LIBRARY MATERIALS AND ITS SCOPE

Numerous historical and library studies indicate that at all times in any country, governments protected secret information - military, economic, commercial, and other types (Choldin, 1996; Yermolayev, 2005; Zhirkov, 2008). For this purpose they used different various forms and methods of restrictions in ensuring access to documents containing information that is not publicly available, as well as for publications, the distribution of which is recognized as undesirable by the official authorities.

The scope of restrictions and their motives in different countries at certain stages of their existence were and remain different, being in direct dependence on the level of development of culture and the moral foundations of society, the political system, and legal norms of each state.

The interdisciplinarity of this study predetermined the choice of research methodology: a set of principles and approaches (historical, cultural, systemic and structural, functional, institutional, and others) used by scientists in such areas as book history, library resource management, information law, and information protection.

Research methods used in this study:

- Comparative historical for analyzing the social and state role of special libraries in the context of history and the influence of censorship on them;
- Systematic review and comparative analysis for studying the functioning of the collections in the largest libraries of the world, as well as for analyzing the legislative framework that determines the conditions for access to information in different countries;
- Situational analysis in the study of difficult situations in practical work, and ways to resolve them.

The problems of library censorship and free access to information are quite relevant for the entire world community. The International Federation of Library Associations and Institutions (IFLA) considers the protection of the principle of freedom of information to be one of its top priorities. The right to know and the right to freedom of expression are two aspects of this principle.

Libraries play a central role in securing these rights, which is why IFLA advocates the right of libraries to acquire, organize, preserve, and make available to all users - regardless of race, religion, gender, age, or other factors, based on professional principles, not political, moral, and religious views of governments, authorities, or individuals

- a wide variety of materials, reflecting pluralism and diversity in society, strengthening democracy, and freedom of discussion. In 1988, IFLA developed and adopted the Universal Availability of Publication program, the goal of which is to fully meet the potential needs of publications, wherever and whenever there is a need for them, as well as to identify obstacles to achieving accessibility of information (KREF, n.d.).

In accordance with the principles of the IFLA/UNESCO Multicultural Library Manifesto, every member of our global society is entitled to a full range of library and information services. In this regard, libraries are encouraged to take into account the needs and interests of all communities, without exception, and provide them with equal access to a wide range of materials and services. This will allow libraries to develop harmonious coexistence and interaction of different cultures in an atmosphere of mutual trust, as a guarantee of peace and security throughout the world.

Nevertheless, in the world, questions repeatedly arise regarding access to certain content of literature containing the spiritual, material, intellectual, and emotional characteristics of individual communities or social groups, and which is subject to consideration on the basis of moral and ethical principles that violate the balance of moral education and peaceful coexistence of peoples.

Departments containing literature closed for wide access were available in most libraries in the world, but unlike the Soviet special depositories, literature was sent to them, as a rule, for non-political reasons. The oldest of these departments is the famous *L'Enfer* (Hell) of the French National (former Royal) Library, which has existed since the sixteenth century to the present. Before the Great French Revolution, literature banned due to political or religious reasons and confiscated during searches of manuscripts of any content was also sent there. In other words, this division had the same functions as Soviet restricted-access collections ("spetshran") later. These so-called "closed libraries" also existed in the Vatican (Academic.ru, 2021).

2. LIBRARIES IN THE ERA OF THE USSR AND PRESENT-DAY RUSSIA

In the Union of Soviet Socialist Republics (USSR), special depositories were created at the largest libraries in order to conceal "anti-Soviet" literature. They simultaneously contained books banned before the revolution, White Guard and emigrant editions, and all publications of the

Russian diaspora and Soviet confiscated by Glavlit.¹ Very often books were banned not for their content, but for mentioning the names of “enemies of the people” in them. In addition, hundreds of books on the history of Russia were subject to the ban (Zelenov, 2000). It is known that in the “tsarist special depositories” of the Library of the Academy of Sciences (LAS) and in the Imperial Public Library the number of books did not exceed several hundred (if we talk about editions in Russian), while in the process of disbanding the special depositories of large Soviet libraries in 1989-1990, it was found that some of them contained up to half a million books and periodicals (Blium, 2000).

The most widespread type of literature of limited distribution in Russian libraries is the so-called “official material” (Equivalent to US DOD classification FOUO – For Official Use Only). It is known that this type of publication since the 60s of the last century was the same integral part of the library special depositories as the literature withdrawn from open collection according to Glavlit’s orders. At present, the special depositories of practically all libraries have been renamed into the “Collection for limited distribution.” Among all the variety of forms of censorship, this specific type of it (namely, official material) has always remained in the shadows.

As a rule, special guards were divided into two parts:

- a collection of literature confiscated from open library collections by order of Glavlit;
- a collection of domestic publications of a departmental character with the stamp “For Official use only” (DSP).

The rules for admitting readers to these two divisions of the special guard were the same: A letter of application from the place of work or study was required. In addition, it was necessary to provide a power of attorney to receive a notebook with extracts from the used editions of the *spetshran*. Otherwise, the officer of the *spetshran* was charged with the obligation to deliver the working material himself/herself to the place of service or study of the reader. This rigid rule, although it displeased the majority of readers, ensured that information contained in printed materials of limited distribution could only be used for official purposes (Makhotina & Fedotova, 2013).

Employees of the organization who were allowed to work with documents and publications of the “DSP” were prohibited from communicating orally or in writing to

anyone the information contained in these documents and publications, unless it was due to a business need. It was also forbidden to use information from documents and publications of “DSP” for open speeches or publication in press, radio, and television broadcasts, exhibit the documents at open exhibitions, or demonstrate them in public places.

At the end of the twentieth century in connection with the democratic reforms and, as a consequence, with the removal of censorship restrictions, literature containing harmful information appeared in the public domain: recipes for the manufacture of explosive, narcotic, and poisonous substances, methods of weapon-making techniques in an artisanal way, guides on prohibited hand-to-hand combat techniques, etc. Moreover, the authors warn that they do not bear any responsibility for the consequences of using the information contained in such publications. Acting in accordance with the social mission, libraries are forced to make decisions in the mode of storage and access to such publications on the basis of documents developed and approved at the level of ministries/agencies.

Over the long years of their existence, large libraries have collected a large number of “harmful” books. The problem is how to regulate the process of getting dangerous information and ambiguous knowledge to people so as not to harm society. In this case, requirements are imposed on librarians to restrict access to such publications. It should be emphasized that such a measure is not a complete deprivation of the reader’s access to such publications. If the reader justifies that he/she needs the publication for official or scientific purposes, no librarian will interfere with its issuance. The adoption by libraries of local decisions to restrict access to the above publications should not be considered as an obstacle to the exercise of the constitutional right to have access to information (Makhotina & Fedotova, 2013).

Nowadays, the collections of limited distribution at the largest libraries in Russia contain documents and publications that, according to certain parameters, fit within the restrictive framework: extremist literature included by the Ministry of Justice of the Russian Federation in the “Federal List of Extremist Materials,” as well as destructive literature, which, in the general opinion of library staff should not be in an open collection because of the possible negative impact on the individual and society. The restriction applies, first of all, to publications that are mainly of an applied nature and are a practical guide to

¹General Directorate for Literature and Publishing in the USSR.

certain actions (technology for the manufacture of explosives, drugs, a guide to prohibited martial arts techniques, etc.).

In the USSR, the largest special depositories existed in the largest state libraries: the Russian State Library (Moscow), the Russian National Library (St. Petersburg), the LAS (St. Petersburg), and the State Public Scientific and Technological Library of the Siberian Branch of the Russian Academy of Sciences (SPSTL SB RAS, Novosibirsk). They kept up to 500,000 copies of printed publications prohibited for open access.

The largest special collections in Siberia were stored at the State Public Scientific Technological Library of the Siberian Branch of the USSR Academy of Sciences. In the late 1970s it contained over 90 thousand units of literature confiscated by the orders of Glavlit. The property of the special depositories was vigilantly guarded by the censorship and state security bodies, and employees were checked and controlled, as were the issuance of literature, the availability of permits, and permits for readers, which were issued for a period of not more than one year.

In the scientific store of the SB RAS institutes there are original developments in the field of new materials and technologies for their production, devices and apparatus, machines and mechanisms, resource-saving technologies, environmental protection, improvement and creation of new varieties of agricultural crops and animal breeds, etc. Research on the above topics, carried out by scientific institutions of the SB RAS, is often of great strategic importance for the country; therefore, documents containing research materials of this kind are transferred to the collections of limited literature of both the research institutions themselves and the State Public Scientific Technical Library of the SB RAS.

Considering the species composition of literature with the mark “DSP” it can be noted that the collection is most fully represented by various scientific reports of research institutes, and then there are books, industry periodicals, abstracts, and dissertations.

- scientific reports – 40%;
- books – 20%;
- periodicals – 17%;
- abstracts and dissertations – 12%;
- normative and technical documentation – 6%;
- others – 5%.

In all institutions, without exception, collections of restricted literature are allocated from the general collection,

and open access to this collection is prohibited. The documents are kept in special safes if there are a few of them.

The readers (mostly employees of research institutes) are allowed to work with this literature only with the written permission of the director or head of the department. Most often, it is drawn up in the form of a list of employees who need to familiarize themselves with the documents of the “DSP” with a business need. This list is updated annually.

After the abolition of censorship, the principle of restricting access to information has been remained, being modified, receiving new legal support and acquiring new parameters of functioning, determining the conditions for the existence of library collections of literature of limited distribution. Often, library special collections were transformed into collections of literature, which was published abroad by Russian writers, which included studies, essays, and reference and bibliographic publications dedicated to the history of Russian emigration, and the activities of individual scientists, writers, artists, and political and scientific associations of emigration, regardless of the language and place of publication.

The library community had faced many questions, related to accessibility and openness of library collections, due to the Federal Law on Countering Extremist Activity No. 114-FZ (On Countering, 2002), adopted in 2002. Materials recognized as extremist are included in the “Federal List of Extremist Materials,” which began to be compiled in 2007. By mid-2021, the Federal List of Extremist Materials already includes about six thousand printed works: books, brochures, newspapers, leaflets, posters, and electronic resources, including DVDs, Internet sites, and individual pages to them. Video and audio recordings and other materials are recognized as extremist. Many pages of an extremist type are located in such popular social networks as Vkontakte, YouTube, and Odnoklassniki. The public prosecutor’s office regularly checks the availability of not only printed publications in libraries but also their electronic versions, as well as the facts of readers’ access to electronic pages and individual sites on the Internet.

At present, an understanding is coming from both the official authorities and the public that not only information must be protected from unauthorized access, but also a person must be protected from harmful information. This evidences the adoption of the Federal Law on Protection of Children from Information Harmful to Their Health and Development (2010). This law has many points related to libraries.

According to the Law the following information is pro-

hibited for distribution among children and for loans in public libraries:

- encouraging children to commit acts that pose a threat to their life and health (including suicide);
- encouraging the use of narcotic, psychotropic drugs, tobacco, alcoholic, and alcohol-containing products;
- encouraging to take part in gambling, prostitution, vagrancy, or begging;
- justifying violence and cruelty, encouraging violence against people and animals; containing obscene language; pornography.

This is an undeniable set of requirements from the point of view of a parent and educator. But besides this, the dissemination of information is prohibited:

- denying family values and forming disrespect for parents and other family members;
- justifying unlawful behavior.

And these are not entirely unambiguous formulations in relation to world fiction and drama, where “fathers and children” or the illegal behavior of the hero of adventurous and adventure literature may be involved, where the hero overcomes the rule of law in the name of ideological values (e.g., Robin Hood, obviously for children under 16 years old, unless there are sources proving the cultural and historical value of the history of a man who in England was called an “outlaw.”)

As the Federal Law is aimed at making conditions for the full moral and spiritual development of children, it should contribute to the formation of a harmonious and psychologically stable personality of each child, and careful and competent upbringing of children based on the ideas of goodness and justice. At the same time, the law “does not aim to shield children from the problems and difficulties of modern life, or create the illusion that there is no evil, violence, or death in the world.” However, any information should come to children only in accordance with their age, and in such a delicate form, as far as it corresponds to their age development (Trushina, 2011).

3. RESTRICTED COLLECTIONS AT LIBRARIES IN EUROPE: PAST AND PRESENT

Despite the abolition of censorship, in many states that

position themselves as “democratic,” there are a kind of “indexes” on the prohibition of the distribution of publications.

In the socialist countries of Eastern, Central, and Southeastern Europe, almost until the end of the 1980s, most of the emigre literature published abroad was banned for the general public and fell under the category of limited access or “anti-Soviet” literature. Nevertheless, a small number of copies were kept in special collections of libraries for counter-propaganda and research purposes. In Latvia at that time there were only two incomplete and limited collections of emigrant literature available to prominent scientists and highest Soviet officials. The dissemination of “anti-Soviet” information was severely punished, with up to ten years in prison (Dreimane, 2020). Many publications of emigrant literature settled in libraries in the USA, Great Britain, and Canada. As Soviet censorship weakened in the late 1980s, libraries began to systematically acquire exile books. In 1989, shortly before the independence of Latvia, the cultural heritage of Latvian emigrants returned to the library: books, documents, and artifacts. The whole library of the Latvian Society in Uppsala (books and periodicals) was donated to the State Library of Latvia (now the National Library of Latvia).

To date, not all European countries have separated collections of literature restricted in their distribution. For example, in the National Library of the Czech Republic, materials under the “special protection regime” (ZOR) are not kept separately. Those published materials are lent to readers in the Scholars’ Reading Room and are under the jurisdiction of the Library Services Division. This department regulates access to a publication if it is in conflict with certain sections of the law (pornography, child pornography, genocide, extremist movements, etc.). Readers can get access to publications of this kind strictly for scientific purposes and only in the Scholars’ Reading Room. To do this, the reader must provide a letter of recommendation from an academic or pertinent professional body on a signed letterhead paper, or shall provide a list of at least five of his/her professional publications on the subject pertaining to the statutory provision mentioned to the head of the Reading Rooms Department. In addition, such a library unit must not be made available to people under the age of 18.²

In 2007, British libraries found freely available works by pseudo-Islamic extremist public organizations, books by the radical cleric Abu Hamza al-Masri and Sheikh Abdullah al-Faisal, whose lectures inspired Islamic fun-

²<https://www.en.nkp.cz/services/links/rules-and-regulations/zor-en>

damentalists in a series of terrorist attacks carried out in London in 2005. This discovery angered the British public, which spoke out harshly and uncompromisingly for the removal of all these materials from the collections of London libraries: “Taxpayer money should not be used to fund extremism... After all, the library system is meant to educate and inform, not to cause separatism and bigotry” (Watson, 2007).

After the scandal that broke out in 2007 in the country, there was an urgent need to develop a special document regulating the flow of materials on “controversial” topics. The Guidelines for the Management of Controversial Content in Public Libraries, developed in November 2007 by the State Commission of the Council of Museums, Archives and Libraries (MLA),³ was developed to regulate a common approach to combating inflammatory and extremist materials disseminated through public libraries. At the same time, the document is intended to protect freedom of speech and access to information: “Access (to information) should not be restricted on any grounds other than the law. If publicly available material is not subject to legal sanctions, it should not be excluded for moral, political, religious, and racial or gender reasons in order to meet the demands of the interests of different groups” (Museums, Libraries and Archives Council, 2007).

The Guidance argues that in the interest of preserving intellectual freedom, material should not be rejected just because it is considered controversial. The library should cover all controversial issues and different points of view in the interests of democracy and openness. It is possible that over time, publications on controversial topics may become the subject of historical interest. As a result, all materials received by the libraries should be cataloged, and information about the collections should be available through the catalog for everyone inside the library and remotely. At the same time, the Guideline refers to the policy of the British Library that “if a document that is in the library collection in accordance with criminal and/or civil law is restricted in its issuance to users, then in such cases the Library retains the work in its collections, but access to it will be blocked until access is permitted by law.”

The German Constitution contains a laconic phrase: “There should be no censorship” (Ravinsky, 2005). In German society, the right to freedom of opinion and freedom of information is one of the fundamental rights. However, this right has boundaries that are strictly defined by laws such as the Penal Code, the Protection of Young Persons

Act, and the Constitutional Right to Human Dignity. Information that is unacceptable for free distribution in Germany includes:

- calls for war;
- distribution of propaganda materials of organizations prohibited by the constitution;
- calls for criminal violence;
- depiction of violence and incitement to racial hatred;
- insulting religious beliefs, religious communities, and ideological associations;
- distribution of pornography;
- libel and slander.

Most of the above categories of materials are prohibited for public distribution. In extreme cases, the prohibition applies not only to the distribution, but also to the storage of certain types of information (for example, hard pornography and incitement to racial hatred).

German libraries have the right to acquire and store materials that are prohibited for open access. It is allowed to loan them to adult readers who have submitted a written statement that these materials will be used personally by them and for strictly scientific purposes. Posting this kind of material in the public domain is prohibited by German law. Naturally, literature propagating fascism and racial hatred is in restricted access (Ravinsky, 2005). An illustrative example was one that showed the complexity of the ethical problems facing librarians. In Slovenia, a study was carried out “which indicated some ethical aspects of library work.” Three topics were chosen, on which the “readers” formulated their requests:

1. Methods of committing suicide;
2. Necrophilia;
3. Photos or drawings of corpses that the “Reader” wanted to see.

The main aspect of the research was to observe the response of librarians to such requests. Twenty public libraries were visited in different parts of the country. Fifty-two librarians were involved in the research.

- The research results were as follows:
- 21 librarians acted completely calmly;
 - 5 librarians were worried;
 - 2 librarians were outraged;
 - 8 librarians were confused;

³Its functions relating to museums and libraries were transferred on 1 October 2011 to the Arts Council England.

10 librarians tried to give advice;
8 librarians were stunned;

In addition, the following reactions were named: embarrassment, fear, laughter, and lack of understanding.

When summarizing the results of this experiment, it was noted that, in general, librarians were not shocked by strange requests; they did not see a particular ethical problem in front of them. Public library workers try to satisfy the reader's need for information; they are not concerned with judgments about the ethical status of the requested information (Ravinsky, 2013a).

From the memoirs of the prominent Russian librarian E. Sukiasyan, in Sweden the computer screen stopped working as soon as the reader "took out" the library card. This was due to the fact that the reader works in a public library, so the system must know to whom it is giving the information. By inserting his library card into the slot, the user opens information about him/her to the system. In Swedish libraries, restrictions on both age and specialty existed already at the end of the 1970s. For example, some literature on medicine, chemistry, and forensic science was available only to specialists. In the USSR, at that time no one limited the literature on explosions and poisons. Textbooks on forensic medicine, psychiatry, and forensic science could be found in many public libraries. In the public library of Potsdam, where the storage was open to readers, Sukiasyan found two doors that did not open. Special literature for some categories of readers was kept there. Entry for other readers was strictly prohibited (Sukiasyan, 2019).

4. RESTRICTED COLLECTIONS AT LIBRARIES IN EAST ASIA: PAST AND PRESENT

South Korean libraries also refer to the term "special materials," which correspond to "materials of political and ideological content produced and published by North Korea and anti-state organizations; materials praising or promoting the activities of North Korean and anti-state organizations and their members; materials of praise or propaganda for the communist ideology or system; or other materials that deny the legitimacy of the Republic of Korea or deny the system of free democracy" (Song, 2011, p. 83). Storage and access to materials is carried out in accordance with the established "Guidelines for Handling Special Materials." The guidelines instruct libraries to store

these materials only offline, and they are prohibited from digitizing and posting on the Internet, where access to them is more difficult to restrict. Access to these materials is provided purely for research purposes in the presence of a special document from the leadership of the research institute. Although the guidelines' restrictions only apply to North Korean material with political or ideological content, most libraries automatically classify all documents published in North Korea as special and place them under restrictions. In this regard, the acquisition of North Korean materials in the libraries of the Republic of Korea has dropped dramatically (North Korean Review Journal, 2020). This resulted in a lack of reliable sources for researchers and a decline in the quality of research results.

In China, books are censored containing a positive or at least neutral image of the Dalai Lama. The publication of any work by Liu Xiaobo, a Chinese human rights activist and outspoken critic of the Communist Party, is prohibited. Like Mao Zedong, Xi Jinping has continued many of the methods of censoring media and literature introduced by the Cultural Revolution. Xi Jinping, the current general secretary of the Chinese Communist Party, continues to ban books in mainland China, Hong Kong, and Taiwan that are considered "politically incorrect." The state directed libraries to censor pro-democratic books and textbooks used in schools, all to promote "patriotism and ideological purity in the education system."⁴

The Chinese Ministry of Education ordered the removal from school libraries of books "promoting Western values and capitalism." The decision will affect 240 million children. They are now expected to focus on "patriotic literature," writes an English-language newsmagazine *Nikkei Asia*.⁵ The authorities' clear goal is to nurture loyalty and devotion to Xi Jinping in young people in the run-up to the centenary of the Chinese Communist Party.

The definition of "propaganda of Western ideas and values" is very vague, so the Chinese fear that children may be prohibited from reading any foreign works. In the People's Republic of China, religious literature and books with "scientific errors" have already been banned (Hadano, 2021).

5. CURRENT SECURITY THREATS AND QUESTIONS ABOUT ACCESS TO LIBRARY COLLECTIONS

The borderline between the decision of the librarian,

⁴<https://knife.media/secrets-of-the-chinese-censorship>

⁵<https://asia.nikkei.com>

when for ethical reasons he/she cannot recommend this or that edition, and the infringement of the rights of the reader is rather arbitrary. In reality, since in any state there is information that is closed for public use, library collections also contain literature that has restrictions on reader access (Altukhova, 2000). Over the past twenty years, national library associations have adopted a professional code of ethics in most developed countries. In all these documents, a prerequisite is the need to ensure the right to unhindered access to information. Professional organizations of librarians in Australia, Great Britain, Hong Kong, Israel, Italy, Canada, Lithuania, Malaysia, Mexico, Portugal, Russia, Slovenia, USA, Ukraine, Philippines, Croatia, Switzerland, Sweden, Sri Lanka, and Japan recognize the duty of a librarian as a basic professional principle to provide readers with access to information without restrictions, if they have not been previously clearly established by laws, which is fixed in their codes of ethics (Trushina, 2005). It is obvious that the growing number of threats to society through the uncontrolled distribution of information is forcing the library communities in many countries to reconsider their views on free access to collections.

One of the most important documents, from our point of view, is the UNESCO Manifesto, which has been edited and republished several times. One of its postulates reads as follows: "Freedom, prosperity and the development of society and of individuals are fundamental human values. They will only be attained through the ability of well-informed citizens to exercise their democratic rights and to play an active role in society." The statement that library collections and services should not be subject to any ideological, political, or religious censorship appeared in the 1994 Manifesto. Oddly enough, this problem is currently relevant for developed democracies that have long since put an end to state censorship, but faced attempts to censor library collections by local social movements or political and religious parties. For example, there is information about serious contradictions arising between representatives of various social strata of the United States, who express a desire for their children to be protected from "harmful" information available in the library collections, and library employees who strictly observe the principle of unlimited freedom of access to any information (UNESCO Manifesto on Public Libraries, 2000).

One of the main ethical principles of the western library community is the thesis about the ideological neutrality of the librarian. But, despite the librarian's credo: "In western society: no politics, no religion, no morality" (Foskett, 1962), in a number of democratic countries this

principle is often violated. When it comes to national security, this motto practically loses its relevance. Indeed, with the help of certain books and Internet resources, one can quickly and without additional costs find a variety of data on the methods of making improvised explosive devices, methods of carrying out terrorist crimes, and other information that carries a potential threat to society.

In the West, one of the most important human rights is "privacy," that is, the right of a person to protect information about his/her private and professional life from disclosure and to remain free from surveillance, except in cases established by law. Privacy is also important for libraries, as one of the instruments of democracy (Ravinsky, 2013b). One of the articles of the American Library Association's Code of Ethics states: "We protect each library user's right to privacy and confidentiality with respect to information sought or received and resources consulted, borrowed, acquired or transmitted." Another thing is that the above-mentioned document has no legal force, but nevertheless convinces the reader that the library will keep its form private and confidential.

Several different positions have been formed on the problems of unhindered access to information in libraries (Ravinsky, 2017):

1. Defending the principles proclaimed in the documents of library organizations requires constant compromises, taking into account the interests of various national associations. Refusal to compromise can lead to confrontation both within library associations and with government structures;
2. Principles are more important than specific circumstances; one cannot be led by governments that often violate human rights;
3. Providing support for civil liberties with a conservative policy in the country (for example, the attitude towards Cuban librarians who work under conditions of strict government censorship, in particular restrictions on access to the Internet).

It follows from the above that the attitude of foreign librarians to the problem of restricting access to information is very ambiguous.

6. INTERNET CENSORSHIP

In the modern information society, there is a problem of restricting access not only to printed materials, but also to electronic resources. The Internet has unlimited pos-

sibilities due to its globality, accessibility, and popularity. These entire factors make the “World Wide Web” a dangerous means of disseminating information in the hands of unscrupulous manipulators, in particular those with extremist views. The researchers note that with the help of Internet resources, it is possible to quickly and at no additional cost find a variety of data on the methods of making improvised explosive devices, or methods of carrying out terrorist crimes. Virtual social networks as a means of communication have a great impact on the formation of interethnic relations. In the modern world, interethnic topics in virtual social networks are often presented in a sharply negative context, involving nationalism and ex-

tremism.

Freedom on the Net is an annual report providing analytical reports and numerical ratings regarding the state of Internet freedom for countries worldwide, published by the American non-profit research and advocacy group Freedom House (Centre for Human Technologies, 2021). The authors of the study emphasize that they recognize the existing cultural differences, national interests, and different levels of economic development of states, but are guided by the universal criteria of freedom of information, the starting point for which is Article 19 of the Universal Declaration of Human Rights: “Everyone has the right to freedom of opinion and expression; this right includes

Table 1. Extent of Internet censorship in different countries

Country	Restrictions	Reasons	Place in the ranking of countries in the world by the level of Internet freedom ⁶
China	Twitters, Facebook, and YouTube are blocked. There is no access to Wikipedia. National web services are operated instead of it.	China blocks resources not by the type of content (there are even oppositional websites inside the country), but by geography - the authorities fear mass unrest due to the efforts of foreign instigators.	65
USA	Filtering at the national level is carried out in a number of organizations, such as schools and libraries, under the Children’s Internet Protection Act (CIPA).	Blocks access to certain web pages, including pornography, advertisement, chat rooms, games, social media, and online forum sites	6
Russia	Blocking terrorist and extremist websites	Extremism, child pornography	51
Germany	The Network Enforcement Act is in force. State filtering of some websites	Hate sites, child pornography	4
DPRK	There is only the national public Internet “Gwangmyeong,” which contains information about communism and scientific and technical literature.	Information on the Internet is devoted to political propaganda, praise of the ruling dynasty, and harsh criticism of the West, the USA, Israel, Japan, and South Korea.	The rating does not include
Cuba	Google and Bing are blocked. Access to the Internet is only in government agencies and foreign companies. There is only one government-owned Internet service provider.	The search is carried out only in accordance with the “goals of a socialist society.”	62
Syria	The fact of blocking is not hidden - users receive a blocked page with the message “Forbidden content.” Access to the Israel “.il” domain is completely closed. There have been cases of people being arrested for trying to access prohibited resources.	Arab news sites and government-critical sites are censored.	63
Iran	The Computer Crimes Law imposes strict monitoring and filtering requirements on Internet service providers. Many Western sites are blocked and illegal.	Political content, homosexual sites, and sites defending women’s rights are filtered.	64

DPRK, Democratic People’s Republic of Korea.

⁶<https://nonews.co/directory/lists/countries/internet-freedom>

freedom to hold opinions without interference and to seek, receive and impart information and ideas through any media and regardless of frontiers.” At the same time, the Declaration allows for the possibility of restricting the right to information of citizens. Article 29 of the declaration states that “In the exercise of his rights and freedoms, everyone shall be subject only to such limitations as are determined by law solely for the purpose of securing due recognition and respect for the rights and freedoms of others and of meeting the just requirements of morality, public order and the general welfare in a democratic society.” This document applies to all countries, regardless of geographic location, ethnic or religious composition of the population, and level of development (United Nations, 1948). As a result of statistical and comparative analysis, the reasons for the limitation of information in a state with different levels of democracy were identified. Full state censorship has been confirmed in 9 countries: Iran, Saudi Arabia, Turkey, Greece, Russia, India, China, Sudan, and Indonesia. Russia is in 52nd place out of 65, and China is in the last place (Centre for Human Technologies, 2021). The most free from censorship are Estonia, Iceland, Canada, and the United States (Table 1).

In China, there is a state system for filtering Internet content called The Golden Shield Project. There, resources are often blocked not by the type of content (there are even opposition sites inside the country), but by geography, due to government fears of mass unrest by the efforts of foreign instigators, and also for copyright law infringement. Wikipedia was repeatedly blocked; there is no access to Twitter, Facebook, and Google.

In the Democratic People's Republic of Korea, there is only the national public Internet “Gwangmyon,” which contains information about communism and scientific and technical literature. Information on the Internet is devoted to political propaganda, praise of the ruling dynasty, and harsh criticism of the West, the United States, Israel, Japan, and South Korea.

The world community has not come to the conclusion whether the filtering of the Internet at the state level is necessary. On the one hand, the degree of filtration and the filtration profile may be different; on the other hand, part of the answer to this question lies in the ideological plane, so everyone can answer it based on their political preferences (Prokhorov, 2007).

7. CONCLUSION

Libraries are institutions outside politics and therefore

should be focused on providing services for all categories of users, regardless of their race, religion, economic status, etc. In this regard, modern libraries must maintain policies and procedures that serve the diverse needs of their users and protect their right to satisfy their intellectual needs and access all points of view on current historical issues.

Analysis of the modern legal framework in the information sphere shows that in any democratic state the right to information is recognized as fundamental, along with the right to life, freedom, and personal inviolability. However, the practice of restricting wide access to library materials containing information on any parameters (growth in crime, inadequacy on the part of individual users, etc.) recognized by the authorities or society as “harmful” exists in almost all developed countries. The growing number of threats to society through the uncontrolled distribution of information is forcing library communities in many countries to reconsider their views on free access to collections.

Most often, restrictions on access to information around the world are established in order to protect the foundations of the constitutional order, morality, health, rights, and legitimate interests of others, to ensure the country's defense and state security. Certainly, each country has the right to independently define the boundaries between permitted and prohibited information. Based on the content of numerous documents of international importance, it can be concluded that in any democratic state the right to information is one of the most important rights, along with the right to life, liberty, and security of person. However, the state has the right to restrict citizens' access to information within the framework of existing legislation.

As for the modern vision of the role of libraries in the field of information security, it is far from unambiguous. Experts who adhere to the time-tested interpretation of the cultural and social mission of the library see it as a keeper who saves books from the results of false understanding, and the reader from “harmful information,” as well as from the possible consequences of its use. The opposite point of view is that the library is just the organizer of free access to publications from its collections; that is, it should not take its own ideological position in relation to the assessment of the information contained in them.

Currently, the main task of the libraries of the world is to carefully examine all proposals for limited access in order to prevent the existing barrier between users and content.

CONFLICTS OF INTEREST

No potential conflict of interest relevant to this article was reported.

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