

Your response

Questions for industry	Your response
<p>Question 1: Are you providing a UK-established service that is likely to meet the AVMSD definition of a VSP?</p> <p>Please provide details of the service where relevant. The establishment criteria under the AVMSD are set out in annex 5.</p>	<p>Confidential? – Y / N</p> <p>N/A</p>
<p>Question 2: Is your service able to identify users based in specific countries and do you provide customised User Interfaces (UI), User Experience (UX) functionality or interaction based on perceived age and location of users?</p>	<p>Confidential? – Y / N</p> <p>N/A</p>
<p>Question 3: How does your service develop and enforce policies for what is and is not acceptable on your service? (including through Ts&Cs, community standards, and acceptable use policies)</p> <p>In particular, please provide information explaining:</p> <ul style="list-style-type: none"> • what these policies are and whether they cover the categories of harm listed in the AVMSD (protection of minors, incitement to hatred and violence, and content constituting a criminal offence – specifically Child Sexual Exploitation and Abuse, terrorist material, racism and xenophobia); • how your service assesses the risk of harm to its users; • how users of the service are made aware of Ts&Cs and acceptable use policies; and • how you test user awareness and engagement with Ts&Cs. 	<p>Confidential? – Y / N</p> <p>N/A</p>
<p>Question 4: How are your Ts&Cs (or community standards/ acceptable use policies) implemented?</p> <p>In particular, please provide information explaining:</p>	<p>Confidential? – Y / N</p> <p>N/A</p>

<ul style="list-style-type: none"> • what systems are in place to identify harmful content or content that may breach your standards and whether these operate on a proactive (e.g. active monitoring of content) or reactive (e.g. in response to reports or flags) basis; • the role of human and automated processes and content moderation systems; and • how you assess the effectiveness and impact of these mechanisms/ processes. 	
<p>Question 5: Does your service have advertising rules?</p> <p>In particular, please provide information about any advertising rules your platform has, whether they cover the areas in the AVMS Directive, and how these are enforced. See Annex 5 for a copy of the AVMSD provisions.</p>	<p>Confidential? – Y / N</p> <p>N/A</p>
<p>Question 6: How far is advertising that appears on your service under your direct control, i.e. marketed, sold or arranged by the platform?</p> <p>Please provide details of how advertising is marketed, sold and arranged to illustrate your answer.</p>	<p>Confidential? – Y / N</p> <p>N/A</p>
<p>Question 7: What mechanisms do you have in place to establish whether videos uploaded by users contain advertising, and how are these mechanisms designed, enforced, and assessed for effectiveness?</p>	<p>Confidential? – Y / N</p> <p>N/A</p>
<p>Question 8: Does your service have any reporting or flagging mechanisms in place (human or automated)?</p> <p>In particular, please provide information explaining:</p> <ul style="list-style-type: none"> • what the mechanisms entail and how they are designed; • how users are made aware of reporting and flagging mechanisms; 	<p>Confidential? – Y / N</p> <p>N/A</p>

<ul style="list-style-type: none"> • how you test user awareness and engagement with these mechanisms; • how these mechanisms lead to further action, and what are the set of actions taken based on the reported harm; • how services check that any action taken is proportionate and takes into account Article 10 of the European Convention of Human Rights (freedom of expression); • how users (and content creators) are informed as to whether any action has been taken as a result of material they or others have reported or flagged; • whether there is any mechanism for users (including uploaders) to dispute the outcome of any decision regarding content that has been reported or flagged; and • any relevant statistics in relation to internal or external KPIs or targets for response. 	
<p>Question 9: Does your service allow users to rate different types of content on your platform?</p> <p>Please provide details of any rating system and what happens as a result of viewer ratings.</p>	<p>Confidential? – Y / N</p> <p>N/A</p>
<p>Question 10: Does your service use any age assurance or age verification tools or related technologies to verify the age of users?</p> <p>In particular, please provide information explaining:</p> <ul style="list-style-type: none"> • how your age assurance policies have been developed and what age group(s) they are intended to protect; • how these are implemented and enforced; • how these are assessed for effectiveness or impact; and • if the service is tailored to meet age-appropriate needs (for example, by restricting specific content to specific users), how this works. 	<p>Confidential? – Y / N</p> <p>N/A</p>

<p>Question 11: Does your service have any parental control mechanisms in place?</p> <p>In particular, please provide information explaining:</p> <ul style="list-style-type: none"> • how these tools have been developed; • what restrictions they allow; • how widely they are used; and • how users of the service, and parents/guardians if not users themselves, are made aware of and encouraged to use the parental control mechanisms that are available. 	<p>Confidential? – Y / N</p> <p>N/A</p>
<p>Question 12: Does your service have a complaints mechanism in place? Please describe this, including how users of your service can access it and what types of complaint they can make.</p> <p>In particular, please provide information explaining:</p> <ul style="list-style-type: none"> • any time limits for dealing with complaints; • how complainants are informed about the outcomes of complaints; • any appeals processes, how they work, and whether they are independent from the complaints processes; and • the proportion of complaints which get disputed or appealed. 	<p>Confidential? – Y / N</p> <p>N/A</p>
<p>Question 13: What media literacy tools and measures are available on your service?</p> <p>In particular, please provide any relevant information about:</p> <ul style="list-style-type: none"> • how you raise awareness of media literacy tools and measures on your service; • how you assess the effectiveness of any media literacy tools and measures provided on your service; and • how media literacy considerations, such as your users’ ability to understand and respond to the content available to them feature in your thinking about how you design and deliver your services, for example in the user interfaces, flagging content 	<p>Confidential? – Y / N</p> <p>N/A</p>

<p>and use of nudges.</p>	
<p>Question 14: Do you publish transparency reports with information about user safety metrics?</p> <p>Please provide any specific evidence and examples of reports, information around the categorisation and measurements used for internal and external reporting purposes, and whether you have measures in place to report at country/ regional level and track performance over time.</p>	<p>Confidential? – Y / N</p> <p>N/A</p>
<p>Question 15: What processes and procedures do you have in place to measure the impact and effectiveness of safety tools or protection measures?</p> <p>If not already captured elsewhere in your response, please provide information relevant to all of the measures listed above explaining:</p> <ul style="list-style-type: none"> • how you test and review user awareness and engagement with each measure (including any analysis or research that you would be willing to share with Ofcom); • how often policies and protection measures are reviewed, and what triggers a review; and • how you test the impact of policies on users and the business more generally, such as how you balance the costs and benefits of new tools. 	<p>Confidential? – Y / N</p> <p>N/A</p>
<p>Question 16: How do you assess and mitigate the risk of inadvertent removal of legal or non-harmful content?</p> <p>In particular, please provide any information on:</p> <ul style="list-style-type: none"> • how freedom of expression is taken into account during this assessment; • how appeals are handled and what proportion are successful; and • audits of automated removal systems and, if you have them, any metrics that relate to their effectiveness. 	<p>Confidential? – Y / N</p> <p>N/A</p>

<p>Question 17: Have you previously implemented any measures which have fallen short of expectations and what was your response to this?</p> <p>Please provide evidence to support your answer wherever possible.</p>	<p>Confidential? – Y / N</p> <p>N/A</p>
<p>Question 18: How does your service develop expertise and train staff around different types of harm? (e.g. do you have any partnerships in place?)</p>	<p>Confidential? – Y / N</p> <p>N/A</p>

<p>Questions for all stakeholders</p>	<p>Your response</p>
<p>Question 19: What examples are there of effective use and implementation of any of the measures listed in article 28(b)(3) the AVMSD 2018?</p> <p>The measures are terms and conditions, flagging and reporting mechanisms, age verification systems, rating systems, parental control systems, easy-to-access complaints functions, and the provision of media literacy measures and tools. Please provide evidence and specific examples to support your answer.</p>	<p>In the Children’ Media Foundation’s view, one of the key issues is implementation vs. effectiveness i.e. there have been various visible attempts by the platforms to ‘do’ something – such as YouTube Kids. But what is less clear is any indication of effectiveness, and the extent to which children are circumventing the measures.</p> <p>To expand:</p> <ul style="list-style-type: none"> • Terms and Conditions are obviously necessary and have become more visible in recent years. However, research from many industry partners repeatedly tells that they are still too weighty to be read through by most people - especially children. They are therefore ignored and thus meaningless. <p>In recent years regulation has attempted to make it easier for users to find how their data is used by platforms and provide options to opt out: Facebook is a well-known example, providing users with access to preferences and settings, and this is a positive step. However, platforms including Facebook do not generally place key information about settings and preferences, and how self-protection could be achieved, at front and centre, and often they are difficult to read and activate.</p>

	<ul style="list-style-type: none"> • Parental controls: Sky has had some success by applying the child lock as default and enabling subscribers to switch it off if they wish. But nothing of that nature has been applied by VSPs. CMF advocates “default on” and VSP operators should investigate and report on how that might work on the video sharing platforms. • Complaint functions: These are becoming more visible – which is a positive step. But the visibility or speed of automatic reaction to complaint is not the same thing as follow-up and explanation of follow-up actions taken. It is commonplace on the main platforms for the criteria and policies for dealing with complaints to be opaque and applied inconsistently and subjectively. Many forums, boards and social media groups are crammed with examples. <p>An example of good practice was the BBC, which originally used pre-moderation to curate user generated content. This became massively expensive, and subsequently they applied a policy to user-generated content which meant that if there was a complaint they would take the content down while it was investigated by a human. The BBC no longer takes this approach. It curates very little UGC on its own platforms, instead using social media channels and platforms. Which takes us back to the same issues.</p> <ul style="list-style-type: none"> • Media Literacy: Platforms make efforts to engage their users but if they cannot admit that they are under the age of 13, how can they create appropriate and relevant media literacy packages which are effective for young people? <p>It would be useful to see research into the effectiveness and usage of the various media literacy initiatives currently offered by the platforms. We believe them to be under-used.</p>
	<p>Minimum age requirements</p> <p>The concept of protection for children through the</p>

Question 20: What examples are there of measures which have fallen short of expectations regarding users’ protection

and why?

Please provide evidence to support your answer wherever possible.

application of minimum age requirements restricting access to VSP services is fraught with problems in the real world.

This applies equally to children under the age of 13 falsifying their age when registering and to “walled-garden” solutions that attempt to attract children to dedicated services such as YouTube Kids.

Age verification can be circumvented – and children routinely tell researchers that they simply lie about their age. The most recent attempt to impose age verification legislation (Digital Economy Act 2017) was dropped in October 2019 because it could not be implemented. We are concerned that dependency on age-verification systems will lead to nothing being achieved in the near to medium term.

Rating systems are a good idea but have some practical difficulties. In many instances, they rely on the producer to categorise their own content which can mean they are influenced by their desire to broaden their audience rather than clarifying the nature of the content. Organisations such as Common Sense Media have attempted to rate content as a third party service: however their editorial experience is limited. In both examples, the approach is prone to inconsistency.

The other challenge of ratings is that the context that content is being used is just as important as the blunt instrument of an age rating.

In such a nuanced area, the only effective approach is a consistent application of guidelines for curating content, and a regular publication or feedback and review of the approach taken. This is essentially the role of the BBFC around film and video content, or the responsibility of the publishing platform (the broadcaster) in the regulated world.

The CMF has long argued that the situation could be improved if social media platforms accepted some of the responsibilities of a publisher rather than simply distributor.

Ofcom’s own research indicates that while at pre-school age initial access tends to be moderated by parents, even young children own devices: in the *Children and Parents: Media Use and Attitudes*

Report 2018. (p4) Ofcom reports that 52% of 3-4 year-olds go online for almost 9 hours a week and 19% have their own tablet. This continues to increase year-on-year and with the increasing age of the child. For a young child YouTube is an effective search engine as well as an endless source of on-demand entertainment fuelled by algorithms intended to make the experience as sticky as possible. This level of usage and familiarity will inevitably mean that parents and families become complacent over time and are less likely to opt-in to parent controls.

Assumptions that younger age ranges are protected by parental controls on devices should not be taken for granted since many parents cannot or do not use them. Independent access to devices and content, combined with an innate curiosity and a lack of discernment, leave even young children vulnerable to landing on, or being algorithmically recommended, inappropriate and disturbing content on VSPs.

A common argument is that separate accounts or 'walled-gardens' can provide safe spaces for children. This approach fails to consider that the use of digital media by children is very different to adults. Children's continued usage of YouTube in preference to YouTube Kids is an example of the failure of walled gardens

Older children are instinctively disruptive. In the media space this is rarely born out of rebellion, but rather a desire to overcome practical constraints such seeking out new content, or cost of use (which unethical businesses are quick to take advantage of by offering free content in return for data harvesting or hidden costs). This means that the safety paradigms that are proposed by adults, including parental controls and walled gardens, are rarely effective.

Regulation of VSPs should take into account the "common fiction" that VSPs are not used by under-13s. The assumption when preparing a regulatory regime should be that children - often as young as 6-8 years old - are watching content on VSPs and experiencing proximity of content in recommendation lists and automated follow-on videos that are frequently inappropriate and

sometimes damaging.

If there is to be a reliance on the platforms' application of age-verification systems, these need to be robust and effective – which currently they are not. Before Ofcom steps away from direct responsibility for regulating the “day-to-day” mechanisms of control and safety, it needs to set up a robust standard for its definition of an age-verification system, that actually works to prevent significant proportions of the under-13 age-range accessing content intended for adults. If this cannot be achieved, and independently measured and verified, then – for the children's audience – much of the purpose of this regulatory regime will be lost.

If effective age-verification cannot be achieved then regulation should focus on re-developing the VSPs as universally safe spaces with specific areas that are restricted for more adult content, rather than the other way around.

This is the accepted societal norm in the offline world. Our society expects that the world children experience is essentially child-safe by default, with restricted areas available for adult behaviour and experiences. For instance, betting shops and gambling machines are restricted 18-plus areas, with specific regulation on their promotional activity and presentation on the high street. No one suggests it would be appropriate to push children out of the public space into 'walled gardens' so that gambling can continue unrestricted.

At the same time no-one suggests that responsibility for child-safety always devolves to 'parental control' in the real world, where it is not assumed that children will always be accompanied by an adult so that that premises, public spaces, business activity etc have to be operated with a duty of care for young people embedded in their practice.

The concept of online 'walled gardens' and the assumption of parental control contradict the Government's stated principle that what is unacceptable offline should be unacceptable online. Any regulation of VSPs should take into account this basic principle which should become

	<p>the “new normal” of online regulation.</p> <p>The digital world offers vital opportunities for education, entertainment as well as social interaction. Children should not have constraints placed on their freedoms to use the internet - that would be an affront to the rights of young people in the online world. Therefore, regulation should be formulated which takes a realistic view of their capacity and tendency to overcome the restrictions of age-specific registration, parental controls or walled gardens, with the aim of offering children the opportunity to participate in safety.</p> <p>The CMF finds this statement in your proposal disturbing: “It will be for VSPs to decide which measures are appropriate and proportionate based on their own assessment of the risk of harm. In doing so, VSPs will be able to take into account the level of resources available to them and will not necessarily need to adopt all 10 measures listed in the Directive.”</p> <p>It is simply not good enough to set up a regulatory regime which is as toothless as this. When this is allied to the concept of “not in our territory” then very little will change.</p>
<p>Question 21: What indicators of potential harm should Ofcom be aware of as part of its ongoing monitoring and compliance activities on VSP services? Please provide evidence to support your answer wherever possible.</p>	<p>CMF assumes that charities and academics more directly engaged in monitoring online harms to young people will provide considerable evidence of lack of response or slowness to respond at social media platforms.</p> <p>We would refer Ofcom to the 5Rights Foundation report on online harms during the Covid19 crisis https://5rightsfoundation.com/uploads/final-5r-response-to-hasc-consultation-on-covid-19.pdf for the most up to date assessment of the risks to young people on social media and other platforms.</p> <p>There is clear public concern about children and young people’s use of media online. The dangers have become much more apparent to parents in the last few years since the ascendancy of YouTube as a regular media destination or children of all ages, and the arrival of other media platforms such as Tik Tok.</p> <p>One single example stands as a voice of concern which is typical of the fear felt by parents that their children’s and teens’ viewing is “out of</p>

	<p>control”. The Australian prime minister sums it up in just one recent case concerning a failure to moderate and remove by Tik Tok: https://www.youtube.com/watch?v=moj9SqsPY4A</p> <p>A further, broader example comes in recent investigations into the ‘manosphere’ which indicate that capturing the eyes and ears of the young is the first step towards radicalisation including misogyny, violence towards women and alt-right political views. This subversive material is increasingly watched by UK teens. http://oro.open.ac.uk/61128/.</p> <p>All of this points towards a duty of care by the platform providers, but there is little evidence of progress. Ofcom should therefore take a firm and rigorous view of the potential for harm and the likelihood that platforms will fail to react.</p>
<p>Question 22: The AVMSD 2018 requires VSPs to take appropriate measures to protect minors from content which ‘may impair their physical, mental or moral development’. Which types of content do you consider relevant under this? Which measures do you consider most appropriate to protect minors?</p> <p>Please provide evidence to support your answer wherever possible, including any age-related considerations.</p>	<p>Types of Content</p> <p>CMF would respectfully suggest that Ofcom ought to know perfectly well what forms of content, whether searchable or recommended, are inappropriate for children under the age of 13 to be forced to experience simply through their engagement with algorithmically managed platforms.</p> <p>It is a straightforward matter of applying the same standards as for broadcast television – pre watershed.</p> <p>While this may seem an extreme approach to services ostensibly aimed at adults, it nevertheless works in the broadcast context, in film classification, and should work with SVoD regulation.</p> <p>The key attitudinal change required at all platforms aimed at “the general public” is that they must accept that in this context “general” means “all ages”.</p> <p>Measures</p> <p>Platforms should redesign their services with the assumption that young people are using them, and material deemed inappropriate by the regulator should be confined to “walled gardens” set up for adults.</p> <p>The platform should be child-friendly by default. In this we are united with the 5Rights Foundation.</p>

	<p>This should include parental controls on devices on by default, and algorithms designed to be cautious and protect rather than promote the inappropriate. Beyond that there should clearly be better and more rapid editorial responses to problem content on the VSPs. If this requires massive manual intervention, they have the resources to fund this. If it requires new forms of uploading rules, delays, reviews, double checking content – then so be it. People can wait for their content while it undergoes due process as it would in any broadcasting environment. If the platforms will not move towards these methods, then Ofcom should use the new regulation to make them do so.</p> <p>In the short term the 15 standards applied by the new Age Appropriate Design Code could be expanded beyond their data protection remit to cover the editorial aspects of video-sharing platforms. The design code requires companies building anything to which children are likely to have access to build in privacy by design – e.g. location details switched off as default. A broader definition of “safety by design” is what’s needed as the changed mind-set at VSPs.</p> <p>The only real solution is to turn the paradigm on its head – i.e. child safe by default...!</p>
<p>Question 23: What challenges might VSP providers face in the practical and proportionate adoption of measures that Ofcom should be aware of?</p> <p>We would be particularly interested in your reasoning of the factors relevant to the assessment of practicality and proportionality.</p>	<p>When it comes to challenges, the common themes tend to gravitate towards cost and technical difficulty: algorithms are not perfect, but they are much more cost effective to implement. This is true.</p> <p>However, YouTube are selective with the data they publish. To get an idea of the scale of the problem requires some assumptions and estimates. Based on YouTube’s own data there are around 720 thousand hours of new video uploaded each day. If the average duration is 10 minutes, that’s 4.3 million new videos every day. We don’t know how effective the algorithm is, but if it’s 99.9%, that still means that more than 40000 pieces of potentially harmful content are being published each day. We would argue that that’s not good enough.</p> <p>Much of the continuing (and growing) problem lies with the refusal of the platforms to accept that they are publishers. Until government and</p>

	<p>regulators tackle this “get out of jail” concept – there can be little regulatory or legal redress when platforms make money out of content which exploits or damages the young.</p> <p>The platforms’ challenge is to overcome the difficult of implementing effective change. They will need encouragement to alter their mindsets and feel confident that their profits will not be damaged as their relationship with their users will deepen and improve.</p>
<p>Question 24: How should VSPs balance their users’ rights to freedom of expression, and what metrics should they use to monitor this? What role do you see for a regulator?</p>	<p>The Children’s Media Foundation recognises the importance of freedom of expression, and the position social media platforms now hold in maintaining that. However, with freedom comes responsibility. That right has always been limited in law to protect the vulnerable.</p> <p>The concern amongst the public is so great that action is needed and in the absence of the Online Harms legislation, the regulator should take this opportunity to set down a marker for future expectations.</p> <p>Many traditional media organisations have long recognised the need to reconsider traditional norms of balancing views: for instance, when science almost universally recognises the evidence of climate change, the fact that Lord Lawson disagrees, does not mean he should be given equal air time. This is the same principle for VPS and social media.</p> <p>This can only be addressed if the problem is properly understood. We see an important role of the regulator is to support research into the psychology of media use by audiences - especially the young - and the extent to which, for example, data-scraping, AI and bot activity are shaping their mindsets.</p> <p>We do not suggest that VSPs should not be open and challenging platforms for the widest possible range of content directed at adults. But we do insist that some of this content will be inappropriate for children and young people. So it should not be included in the algorithmic recommendation systems or the search engines of the general VSP platform which are easily accessed by children. It should be placed within an age-verifiable walled-garden for adults only. While</p>

	<p>there is every possibility that determined young people will continue to circumvent the verification process, the majority who simply wish to access a general VSP platform with varied content for family use would not stray into adult services. And under a system of “safe by default” they would be prevented from stumbling upon unsuitable content through proximity, recommendation and search.</p> <p>Our proposal does not limit free expression on VSPs. It renders it the same status as content in the rest of the media landscape.</p>
<p>Question 25: How should VSPs provide for an out of court redress mechanism for the impartial settlement of disputes between users and VSP providers? (see paragraph 2.32 and article 28(b)(7) in annex 5).</p> <p>Please provide evidence or analysis to support your answer wherever possible, including consideration on how this requirement could be met in an effective and proportionate way.</p>	<p>If VSPs had clear guidance from the regulator as to what is deemed inappropriate for young people, then there would be less debate about at what point editorial decisions should be applied. They would be “compliant” in the way that broadcasters are compliant, to accepted societal norms mediated by a process of government and parliamentary scrutiny of the regulatory standards applied by their regulator.</p> <p>Thus, all the more reason to apply broadcast standards of taste and decency, editorial impartiality, and, once again, a duty of care for the young or vulnerable.</p> <p>It would be helpful if they were required to publish their performance around complaint handling for public scrutiny.</p> <p>However, relying on complaints and rectifying them, is not the same as analysing patterns of complaint, and spotting trends in data and content and even the permeation of or conspiracies and false news. There is a danger that reliance on complaint alone will perpetuate the problems brought about by the fact that VSPs are an unregulated medium.</p>
<p>Question 26: How might Ofcom best support VSPs to continue to innovate to keep users safe?</p>	<p>Push them to redesign. And apply as a starting point the Age Appropriate Design Code’s standards.</p> <p>Work with them to accept their role as publishers and understand that in return for massive profit they have responsibility towards the societies in which they operate, especially the young people in those societies.</p>

	<p>Offer clear and transparent advice on how platforms can come into line with the new regulations. Potentially consider a safety “kitemark” system so that it is clear to the public which platforms are compliant and appropriate places for children to engage.</p>
<p>Question 27: How can Ofcom best support businesses to comply with the new requirements?</p>	<p>Fine them when they fail to comply. The platforms need to understand that through collaborative regulation across Europe, change will come not only to those in the UK jurisdiction, but all the others as well. There need be no fear of loss of competitive advantage if this is clearly communicated.</p>
<p>Question 28: Do you have any views on the set of principles set out in paragraph 2.49 (protection and assurance, freedom of expression, adaptability over time, transparency, robust enforcement, independence and proportionality), and balancing the tensions that may sometimes occur between them?</p>	<p>Our main concern is that this regulation will be toothless in the face of the main perpetrators of lack of care for the younger audience - in particular, YouTube, Facebook and Twitter - that are beyond Ofcom’s jurisdiction. We urge Ofcom to work strenuously to support Irish and other EU efforts to regulate.</p> <p>The European revised AVMSD is in itself too reliant on voluntary self-regulation and gradual change.</p> <p>Upfront safety is essential, as opposed to apologies and trying to put things right after something has gone wrong. The issues are upon us now and they require action, despite the complexities of the commercial landscape and lack of clarity as to where the liability lies. It would seem clear, as with broadcast regulation, that access to a whole society, requires those who profit from that access to be regulated, rather than self-regulate, and for that regulation to take particular account of the needs of young people using those services.</p> <p>Freedom of expression and proportionality are all well and good. But what these profitable organisations are doing is now potentially disturbing the mental health of our young people and endangering the fabric of their futures.</p> <p>Children can't unsee things. Inappropriate content can have an impact on them that they might not shake off in the long as well as short term. Sounds and images can haunt. That's why content</p>



creators use them.

As a pilot for legislation at a later date it is essential that the issues – and potential solutions (in the hands of the platforms) are opened up now, with this VSP regulation. If precedents are set which allow the platform's off the hook, it will be all the more difficult to rein them in through legislation later.

Please complete this form in full and return to VSPRegulation@ofcom.org.uk.