OFCOM CALL FOR EVIDENCE: VIDEO-SHARING PLATFORM REGULATION.

Service users' input into the new requirements that will apply to Video-Sharing Platforms.

Hampshire and Isle of Wight Police and Crime Commissioner's Cyber Ambassadors and Peers Response.

Contents

Background

The Office of the Police and Crime Commissioner (OPCC) here in Hampshire is currently delivering a peer-to-peer Cyber Education initiative in schools across Hampshire, Isle of Wight, Portsmouth and Southampton to ensure Cyber Education and knowledge reaches as many children and young people as possible across our region, cyber safety sessions are also delivered to youth organisations and alternative provisions across the county.

The scheme was successfully piloted in 2016-2017 following our Youth Commission's Big Conversation consultation. Out of the 3,500 young people consulted, 96% of 12-15 year olds found the internet can be risky; 1 in 12 stated they had been contacted by an unknown person in the cyber space; along with many more insights. Evidently, when exciting or anything worrying happens to a young person, their first point of contact is a peer; therefore by skilling up a group of students, they will be able to pass on their learning and offer helpful support. An evaluation[1] of the scheme highlighted the need to roll out the scheme across our region.

The Cyber Ambassador Scheme entails upskilling up 8-10 students in primary and secondary education around current cyber issues, raising awareness, educating and sign posting to advice, help and support. To date, the scheme has now reached 70 junior and primary schools; 35 secondary schools and colleges; 2 Special Educational Needs schools; and delivered 17 online safety sessions to youth organisations including looked after children.

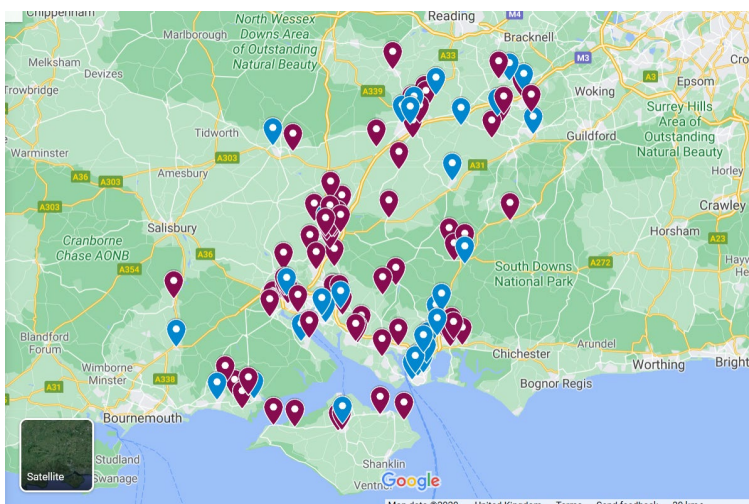*Figure 1: Map showing education settings reached by the Cyber Ambassador Scheme.*

Key:

Blue – Secondary schools/Colleges

Purple – Junior/Primary schools

Working with young people from 4 – 18 years, the scheme is continuously growing and evolving to support children and young people navigate the digital landscape.

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[1] https://www.hampshire-pcc.gov.uk/wp-content/uploads/2019/07/GoFISH_Evaluation_Final.pdf

Delivery Method

- Interactive, engaging and age-appropriate training and learning material delivered to education setting or youth organisation by the coordinators at the OPCC.
- Engagement and support from the OPCC Cyber Ambassadors Coordinators to embed the scheme and promote cyber education.
- Termly evaluations for Cyber Ambassadors (secondary/college students) and their leads/establishments.
- Regular events for Cyber Ambassadors including celebration, refresher and 'catch-up' sessions.

Find out more information about the Cyber Ambassador Scheme via: https://www.hampshire-pcc.gov.uk/cyber-ambassadors.

Insight into VSPs with Cyber Ambassadors and Peers

We put out selected questions and 20 children and young people including Cyber Ambassadors and peers have shared insight into the use of VSPs and changes required to ensure safety and protection from harmful content. This response will represent 20 insights into current experiences of VSPs as shown in Table 1: Number of participants from each age group.
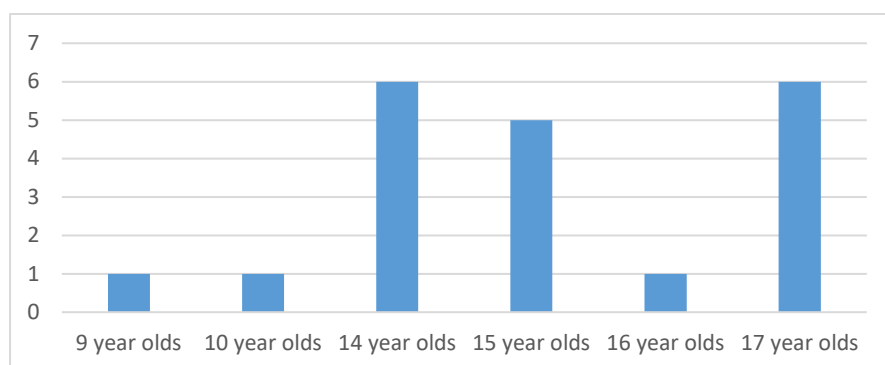
Table 1: Number of participants from each age group

Video Sharing Platforms popular amongst participants:

VSPs used by our participants and their minimum age requirements are outlined in the table below.

Platform/ App	Minimum Age requirement
Tik Tok	13+
Snapchat	13+
Twitch	13+
Bunch	12+
Triller	12+
YouTube	13+
Instagram (incl. reels)	13+
Facebook (incl. Facebook gaming)	13+
Twitter	13+

Figure 2 Platforms and Minimum age requirements

To prompt thoughts and experiences on VSPs participants were asked, 'What are some popular VSPs in the UK'. As evident in Table 2: VSP Popularity Comparison table, Tik tok and YouTube are identified as popular VSPs. Interestingly content on both platforms depends on the respective audience and they have different audiences.

Table 2: VSP Popularity Comparison table

Responses

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.
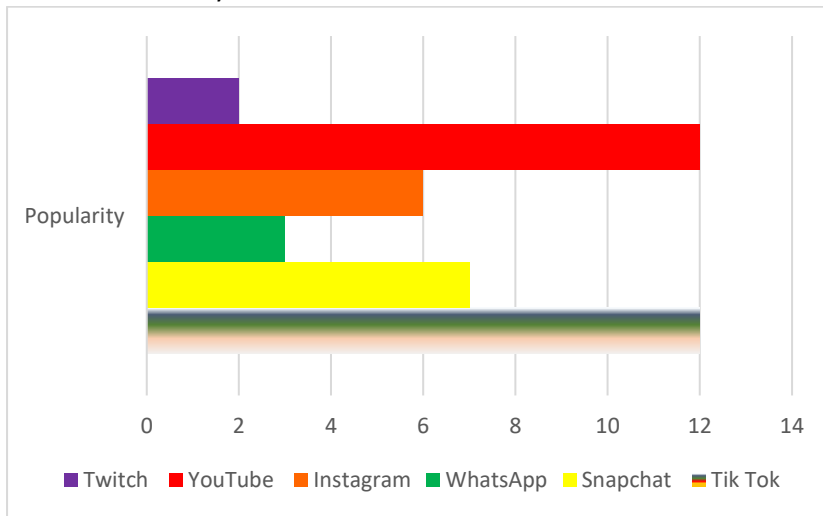
Confidential? – N

Video Sharing Platforms are now more popular than ever before, given the worldwide 'TikTok takeovers' during the COVID-19 lockdown. Individuals are creating content, learning from content, taking part in viral challenges, learning new dances or purely watching content for entertainment. It is almost as if these platforms are contributing to how young people make sense of the world. To explore indicators of potential harm Ofcom should be aware of as part of its ongoing monitoring and compliance activities on VSP services; we adapted this question for participants *'What types of behaviours should Ofcom be aware of that young people feel/act as a result of VSPs?'*
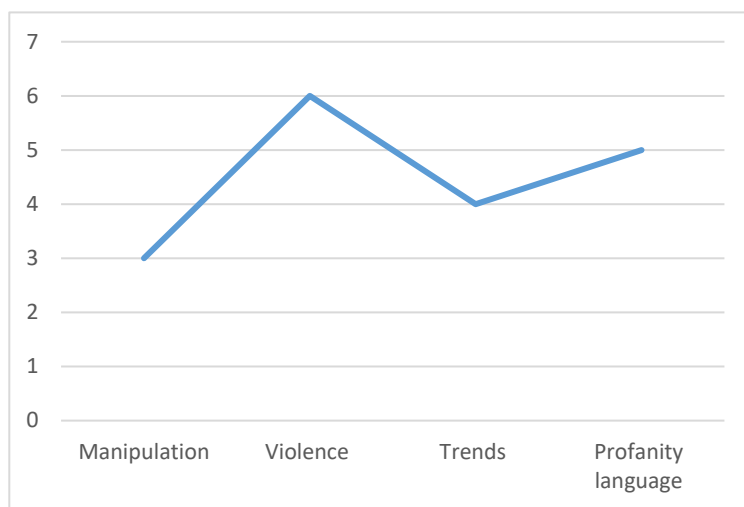
Table 3 Indicators of potential harm Ofcom should be aware of

Potential indicators of harm Ofcom should be aware of include underlying factors outlined in *Table 3 Indicators of potential harm Ofcom should be aware of* highlight 'manipulation' as a common indicator, 'violence imitated from videos' and unsurprisingly 'addictive content' and trends. Although a few of the respondents stated 'I don't know', this may be because of lack of transparency in spotting signs of potential harm.

Given the above responses, there is an urgent need for platform measures having in place and applying terms and conditions to ensure children and young people are protected.

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?

Please provide evidence to support your answer wherever possible, including any age-related considerations.

Confidential? – N

Initially service providers implemented minimum age requirements on their platforms to protect minors from content, which may impair their physical, mental or moral development. The effectiveness of this is highly questionable considering the amount of underage children accessing and using these services as part of their 'Digital 5 a day'. It is important to start thinking about the extent to which our digital natives' development is result of digital consumption. Firstly, responses from our young people, to the question: *'What types of online content would you/ do you find upsetting or distressing?'* (Figure 3), show common themes of *hate content; violence; graphic content; content provoking fear and animal cruelty.*

'Racist content'
'Anything homophobic, racist or offensive to others (Hate videos aimed at a specific group of people who have caused no harm)'
'Animal cruelty'
'Assault or gang violence'
'sad videos'
'Mental health content'

Figure 3 Quotes from children and young people

These themes portray the influence of digital thoughts children and young people may have. How much of an effect are they having on the key development of children and young people is not clear.

We asked participants *'Which types of content would you consider a risk to physical, mental or moral development to children and young people using VSPs?'*

Pie chart data:
- Offensive, racist, hate, homophobic 28%
- Violent & gore 28%
- Drug usage 12%
- Death videos 8%
- Abuse & bullying 12%
- Sexual content 8%
- Nothing 4%
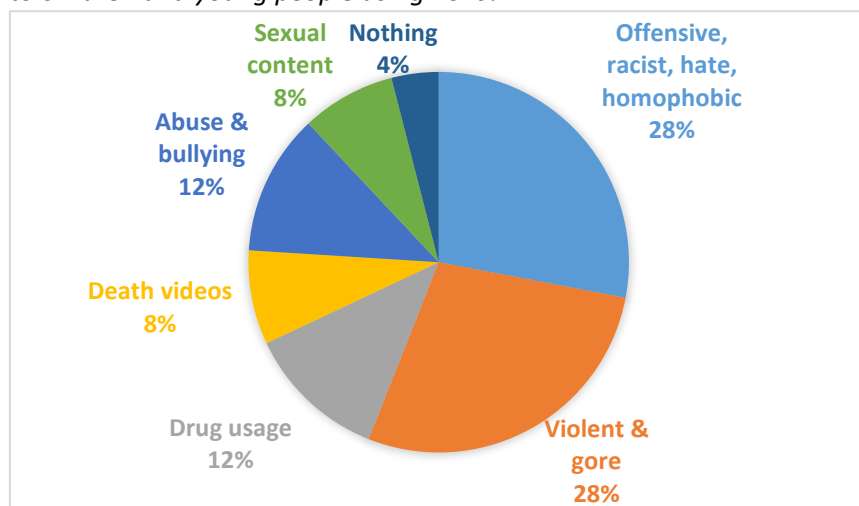
Table 4 Content posing a risk to physical, mental or moral development to children and young people

The content accessed on VSPs has been topical and the increase was seen during the COVID-19 lockdown, as online presence was at all an all-time high. Some popular content on VSPs includes 'life-hack' videos, of which some prove to be dangerous when taking into account a report by the BBC highlighting some of the hacks shared on TikTok which present a risk to the health of users (Criddle, 2020). In the article, TikTok had responded to the BBC enquiry regarding the 'dangerous beauty tricks' and stated, '…the videos did not violate the community

guidelines'. This raises the question on the extent of 'what does it take for content to be considered harmful, a risk to physical, mental or moral development of our now 'Digital Natives'?'. In addition to the responses, harmful content takes various forms, for example 'pro-ana' or 'pro-mia' content promoting unhealthy eating habits; self-harming content; life-threatening challenges such as the 'skull breaker'; or extremist content. Consider the increase in biased cyber-activism, which potentially incites violence or hatred towards individuals of a certain group and many more.

Interactions with participants highlighted the lack of 'action' following reporting on online platforms. We explored the effectiveness of existing reporting and blocking functions highlighted in Table 5 Effectiveness of existing measures.
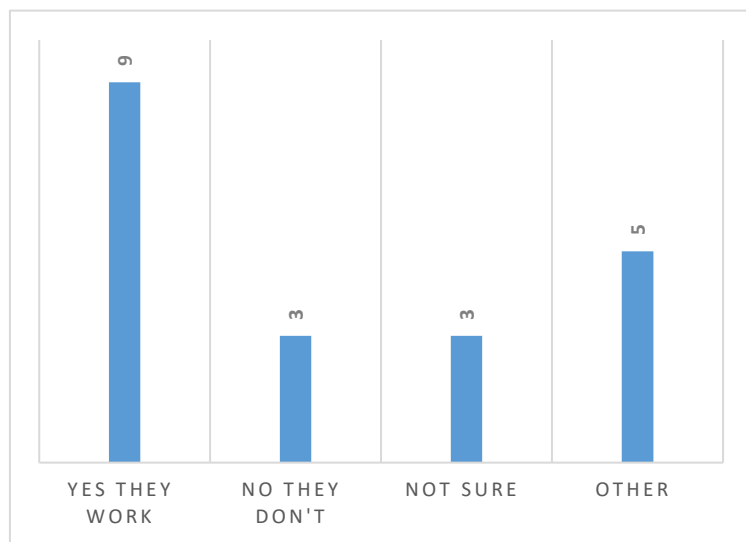

Table 5 Effectiveness of existing measures

Although most participants are confident in the flagging and reporting mechanisms, there is a need for stricter enforcement of this for any VSPs providing services under the UK jurisdiction. The effectiveness of existing reporting and blocking measures are identified as *'mostly, although just one report of a person may not be enough to stop them from continuing to be harmful to others'*. Another gap is addressing the opportunity to carry on harmful behaviour in the cyber space, *'not really they can make another account'*. As an area of development, can the new requirements for VSPs enforce regulations to stop this opportunity. Users have identified strengths in existing measures, *'most VSPs have effective blocking functions but sometimes there are mistakes'; 'existing reporting and blocking functions work for comments and videos most of the time';* and *'yes I find them useful'*.

If a child or young person is exposed to inappropriate content on a VSP, there should be a clear reporting mechanism and reassurance of action to take down the content. Evidently, there seems to be a gap in moderating content being shared on these platforms, taking into account a recent case of a 'suicide video being shared on 'Tik Tok' (BBC News, 2020). As mentioned by two young people we consulted, 'death' videos have made the cut on VSPs. Another young person mentioned coming across similar content to the clip highlighted in the BCC News article, *'people killing themselves and people posting the video'*. VSPs are not currently regulating with rigor the harmful content that is reaching children and young people. We are aware parental controls assist trusted adults to restrict content accessed by their minors in the cyber space, and this is favoured, as outlined in *Table 6 Measures considered most appropriate to protect minors*.
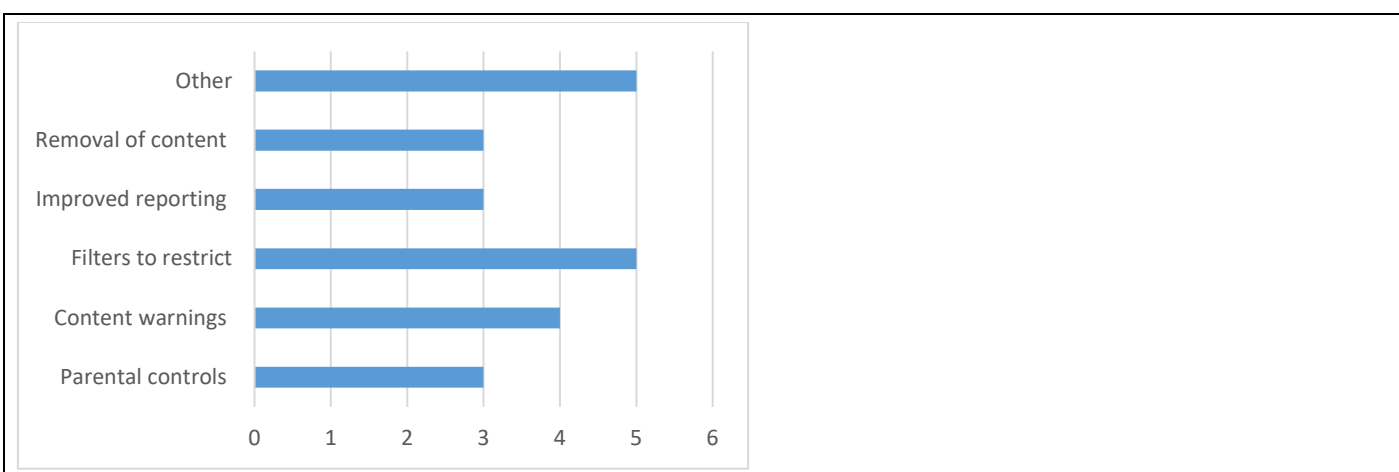
Table 6 Measures considered most appropriate to protect minors

We can already note the gaps in 'removal of content', 'filters to restrict such content from VSPs' and 'content warnings' *especially the reoccurrence of cross platform sharing across VSPs. This massively emphasises the need for measures in place to protect young people from harmful content. Other responses included* 'age restrictions'*, this will provide the age assurance on most VSPs which can be strengthened by introducing age verification methods.* For many VSPs, harmful content seems to slip through the filters and finds a way onto their channels. We have noticed increased headlines and evidence showing trends in issues relating to the availability of harmful content such as violence and gore, portrayed in Table 3. Some platforms have shown clear effort in attempting to reduce and rid harmful content before it reaches their audience or shared across platforms. A popular channel YouTube reportedly removed more 'harmful' videos especially during lockdown, with more than '11 million videos taken down compared to 6 million at the start of the year' (BBC News, 2020). A user, 'I feel safe because YouTube has age restriction for under 18', identified the moderation of content on YouTube in order to protect users. However, more needs to be done to raise awareness of harmful content, appropriate measures to be put in place and ways in which Ofcom can support VSPs to ensure the safety of service users.

Question 26: How might Ofcom best support VSPs to continue to innovate to keep users safe?

Confidential? – N

The digital landscape provides individuals freedom of expression through documenting funny moments, 'life-hacks' and learning new dances. As well as sharing, individuals are exposed to content, which may essentially lead to echo chambers, not allowing them to widen their digital intake. Entering the online world is risky however if we restrict service users' experiences to reduce harm, we are restricting their opportunities to learn or strengthen digital resilience skills in the ever-changing cyber space. Digital resilience is enhanced by exposure to the risk and safely navigating this. Focus needs to be on the adaptability of VSPs in helping users safely navigate the risk and harm. To best support VSPs to continue to innovate to keep users safe, please consider the *Figure 4 How do VSPs make you feel safe when accessing/using them*?, *as* a guidance for the implementation of new requirements;

How do VSPs make you feel safe when accessing/using them?
- Age limits, report and block options and the ability to accept what you wish to see
- Instagram puts warnings on videos
- they have algorithms that block or delete offensive content
- when i am on snapchat i feel happy
- age Restrictions
- i feel safe because YouTube has age restriction for under 18
- Whatsapp makes me safe because i have only got people who i know and whatsapp does not let anyone on it unless i accept or request them
- age restrictions
- bad things are blocked
- yes age restrictions
- age restrictions
- They have content encryption
- I always watch the same channels
- Have report buttons and safe rules
- including trigger warning before hand
- Good
- Their funny and make me smile
- Have report buttons and safe rules

Figure 4 How do VSPs make you feel safe when accessing/using them

Service providers need to regulate platforms to ensure that content is not harmful to the physical and psychological wellbeing of an individual. With the ever-changing and challenging digital world, it is Important to remember that not all children and young people are digitally 'fluent' reinforcing the need for strict moderation of VSPs. As noted in the call for evidence, 'This will include a duty to ensure that VSPs have in place appropriate measures to protect young people from potentially harmful content and all users from illegal content, offensive content, sexual content and incitement to hatred, violence, bullying'. Further to the current safety net in place on VSPs, common guidelines for VSPs to follow should consider Table 8 Guidelines for VSPs to follow.
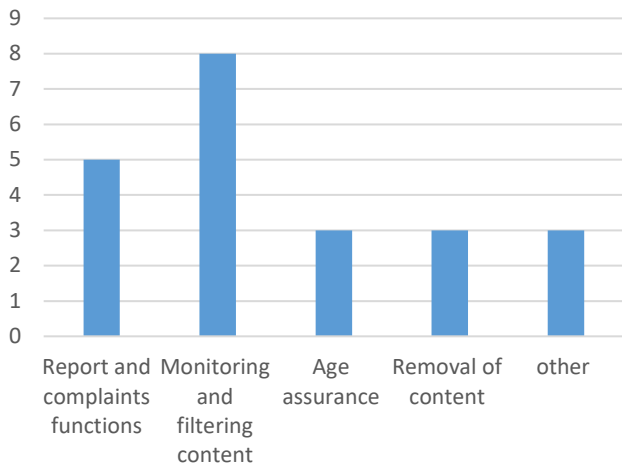
Table 7 Guidelines for VSPs to follow

Outlined in *Figure 5 Suggestions on How Ofcom may best support VSPs to continue to innovate to keep users safe* are some detailed suggestions regarding how Ofcom may best support VSPs to continue to innovate to keep users safe.

- *Keep watch of popular trends and content, so anything harmful can be swiftly removed*
- *Make behind the scene changes so users will not try to bypass it*
- *they can make guidelines the VSPs have to follow about what content shouldn't b shared to keep young people safe.*
- *listen to any and all reports from the people*
- *monitoring safe things*
- *checking them*
- *check the videos*
- *they can keep us safe by helping take down harmful videos and check that the content is safe*
- *Influence kids to report more*
- *Age limits*
- *Report buttons and kids mode*
- *age restrictions on certain videos : photos*
- *Control what's being posted*
- *Share more happy content*
- *Report buttons and kids mode*

Figure 5 Suggestions on How Ofcom may best support VSPs to continue to innovate to keep users safe

References

BBC News. (2020, September 8). *TikTok tries to remove widely shared suicide clip.* Retrieved from
https://www.bbc.co.uk/news/technology-54069650

BBC News. (2020, August 26). YouTube Video Removals doubled during lockdown. Retrieved from
https://www.bbc.co.uk/news/technology-53918584

Criddle, C. (2020, August 26). Warning over 'dangerous' DIY beauty trends on TikTok. Retrieved from
https://www.bbc.co.uk/news/technology-53921081

Appendix 1: Participant responses

Question 1: How old are you?	Question 2: What are some popular VSPs in the UK?	Question 3: What types of online content would you/do you find upsetting or distressing?	Question 4: How do VSPs make you feel safe when accessing/using them?	Question 5: Do you find existing blocking and reporting functions useful/effective /do they work?	Question 6: What types of behaviours should Ofcom be aware of that young people feel/act as a result of VSPs?	Question 7: Which types of content would you consider a risk to physical, mental or moral development to children and young people using VSPs?	Question 8: What action would you like to see in place to protect young people from content which may affect their development?	Question 9: How can Ofcom best support VSPs to ensure users are kept safe?
14	Tik Tok, Snapchat, WhatsApp, Instagram	Anything homophobic, racist or offensive to others (Hate videos aimed at a specific group of people who have caused no harm)	Age limits, report and block options and the ability to accept what you wish to see	Mostly, although just one report of a person may not be enough to stop them from continuing to be harmful to others	Sometimes age limits don't work, meaning younger audiences are vulnerable. This can lead to people feeling unsafe, disturbed or upset with some things that they see online.	Content that is offensive to others (Racist, homophobic, etc), physical violence/gore (E.g fights, death, abuse etc) and sexual content	A system that responds quickly, carries out action and listens to individuals, so it can quickly and efficiently remove harmful content reported by an individual	Keep watch of popular trends and content, so anything harmful can be swiftly removed
14	Instagram, YouTube, tik tok	Mental health content and graphic images	Instagram puts warnings on videos	No, they don't work and are not affective	Addiction, trends, and people feeling as if they have	Explicit content and any form of graphic content and songs	Warnings and complete removal	Make behind the scene changes so users will not try to bypass it

Age	Platform	Content	Safety feeling	Useful	Peer pressure	Harmful content	Improvements	Keeping safe
					to be a certain type to fit in			
14	youtube	racist or sexist content	they have algorithms that block or delete offensive content	most VSPs have effective blocking functions but sometimes there are mistakes	some people are peer pressured into posting on VSPs or watching some content that they don't agree with	content that promotes racist, sexist or offensive views	corporations to improve there ways of reporting offensive content and pushing more videos that promote equality	they can make guidelines the VSPs have to follow about what content shouldn't b shared to keep young people safe.
15	Snapchat and Instagram and facebook youtube	boris johnson	when i am on snapchat i feel happy	no	bad	fighting	Dont let young people see fighting or hurting	dont add people you dont know
14	tiktok	sad video and spider	age Ristrictions	YES	GOOD AGE	TO NOT BE BAD	TO BE GOOD	TO MAKE PEOPLE GOOD
15	YouTube, Facebook and Instagram	all most nude pictures/videos and huge spiders	i feel safe because YouTube has age restriction for under 18	yes i find them useful	fighting, swearing and abusing	interoperate language and sexual abuse	blocking any content that hinder someones development	listen to any and all reports from the people
14	whats app and Facebook , tictok you tube	odd looking spider videos and Donald trump	Whats app makes me safe because i	yes	bad language and scary photos.	looking at scary videos	never search for not very nice photos block if you see any think	monitoring safe things

			have only got people who i know and whats app does not let anyone on it unless i accept or request them					
15	facebook	sad videos	age restrictions	you can block people easily	violence to others themselve property.	people being mean	stop the bad language	checking them
15	facebook.youtu be.snapchat	abusing animals	bad things are blocked	yes	i don`t know	drug taking	age restrictions	check the videos
15	youtube,tik tok,inta gram,snap chat,watsapp	nothing	yes age restrictions	yes they work	i dont know	nothing	it already safe enough	keep it how it is its sucure enoth
14	twitch, YouTube, Instagram.	Donald trump	age restrictions	it works for comments and videos most of the time	people on the internet need to be careful of inappropriate videos	blood core and fighting	reporting people, then the police can remove that dangerous video	they can keep us safe by helping take down harmful videos and check that the content is safe

16	Snapchat	Assault and gang violence	They have content encryption	Yes	Influence of crime	Harmful videos	More protective measures	Influence kids to report more
10	YouTube twitch	Sad ones	I always watch the same channels	I do not know	Inappropriate behaviour	Violence and bad language	Filters	Age limits
17	Tik tok, YouTube	Racist content	Have report buttons and safe rules	Yes	Manipulated	Racist or violent content	Kids mode so parents can turn on, or a kids account like Netflix where only the rating of Maximum of 12 pg and under are shown	Report buttons and kids mode
17	Tiktok, snapchat	animal cruelty	including trigger warning before hand	n/a	violence imitated from videos	drug usage	warnings before all videos	age restrictions on certain videos : photos
17	Tiktok, snapchat	animal cruelty	including trigger warning before hand	n/a	violence imitated from videos	drug usage	warnings before all videos	age restrictions on certain videos : photos
17	Tiktok	Violence between races	Good	Not really they can make another account	Racial	People killing them selves and	Owners of big companies actually asses the	Control what's being posted

							people posting the video	content being posted	
9	Tick Tok	Animal harming	Their funny and make me smile	Sometimes	Violent people. Animal harming and mean people.	Bullying	Help the people that are getting bullied online	Share more happy content
17	Tik tok, YouTube	Racist content	Have report buttons and safe rules	Yes	Manipulated	Racist or violent content	Kids mode so parents can turn on, or a kids account like Netflix where only the rating of Maximum of 12 pg and under are shown	Report buttons and kids mode
17	Tik tok, YouTube	Racist content	Have report buttons and safe rules	Yes	Manipulated	Racist or violent content	Kids mode so parents can turn on, or a kids account like Netflix where only the rating of Maximum of 12 pg and under are shown	Report buttons and kids mode

Appendix 2 – Call for Evidence Email to Cyber Ambassador Scheme Schools

Subject: Call for Evidence for Video Sharing Platforms

Ofcom are currently seeking evidence and information related to the new requirements that will apply to Video Sharing Platforms.

New regulation will come into force this autumn, meaning that Ofcom will be given new powers to regulate UK-established VSPs and ensure that VSPs have in place appropriate measures to protect young people from potentially harmful content and all users from illegal content and incitement to hatred and violence. Ofcom will be drawing up guidance for VSPs on the list of measures set out in the new statutory framework. Consequently, they are seeking views to support their understanding of the VSP sector and the risk of harm on these platforms.

Please may you share and encourage students to fill in responses for the Ofcom Call for evidence: Video Sharing Platform regulation https://forms.gle/dZQQGn5BQR18a21W7. Cyber Ambassadors and peers can help and support the moderation and regulation of the platforms they are using to ensure their safety and protection from harmful content.

Apologies for the short turn around, unfortunately Ofcom published the call for evidence on 16 July; therefore there has not been enough time to consult, as we would have wished. We appreciate as many responses as possible.

Please may you all fill in responses by **Monday 21 September.**

Appendix 3 – Questions Guidance for Ofcom VSP
What is a VSP?

- Sites where users can upload, share and view videos.
- E.g. TikTok, Instagram, Facebook, YouTube, Twitch, Snapchat, WhatsApp etc.

<u>Background Information</u>

- The UK Government have confirmed that Ofcom will be the regulator for UK – established VSPs from autumn this year.
    - This means that Ofcom will be checking that VSPs are moderating content shared on their platforms.
    - This is to ensure young people & all users are protected from potentially harmful content, illegal content and content directed towards violence and hatred.

VSPs in will be required to have in place measures that are appropriate to protect:

- Young people and children from content which may impact their physical, mental or moral development;
- the general public from content directed towards violence or hatred; and
- the general public from content constituting criminal offences (public provocation to commit a terrorist offence, offences concerning child sexual exploitation and abuse, and offences concerning racism and xenophobia).

- VSPs will have to have in place appropriate measures to protect young people from harmful content and all users from criminal content and any content which encourages hatred and violence.
    - Ofcom will be checking that VSPs have these measures in place.

- A piece of European law, called the Audiovisual Media Services Directive (AVMSD), sets out measures that VSPs should consider applying. These include:
    - Having in place and applying terms and conditions
    - Having ways to easy and accessible reporting functions (for users and content)
    - Having parental controls
    - Having ways to check someone is old enough to use the site (effective age assurance)
    - Having a method to make complaints

- Ofcom will give VSPs guidance about what measures they should have in place to protect young people from harmful content and all users from criminal content and any content, which encourages hatred and violence.

- Ofcom are asking for your views so that they can provide the guidance for VSPs.

Questions

Question 21: What indicators of potential harm should Ofcom be aware of as part of its ongoing monitoring and compliance activities on VSP services?

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?

Question 26: How might Ofcom best support VSPs to continue to innovate to keep users safe?

Simplified Google form questions

Question 1: How old are you?

Question 2: What are some popular VSPs in the UK?

Question 3: What types of online content would you/do you find upsetting or distressing?

Question4: How do VSPs make you feel safe when accessing/using them?

Question 5: Do you find existing blocking and reporting functions useful/effective/do they work?

Question 6(Q.21): What types of behaviours should Ofcom be aware of that young people feel/act as a result of VSPs?

Question 7 (Q.22): Which types of content would you consider a risk to physical, mental or moral development to children and young people using VSPs?

Question 8 (Q.22): What action would you like to see in place to protect young people from content which may affect their development?

Question 9(Q.26): How can Ofcom best support VSPs to ensure users are kept safe?