

Your response

Question	Your response
Question 1: Do you have any comments on Section 3 of the draft guidance on harmful material and related definitions?	No.
Question 2: Do you have any comments on the draft guidance about measures which relate to terms and conditions, including how they can be implemented?	No.
Question 3: Regarding terms and conditions which prohibit relevant harmful material, do you have any comments on Ofcom's view that effective protection of users is unlikely to be achieved without having this measure in place and it being implemented effectively?	No.
Question 4: Do you have any comments on Ofcom's view that, where providers have terms and conditions requiring uploaders to notify them if a video contains restricted material, additional steps will need be taken in response to this notification to achieve effective protection of under-18s, such as applying a rating or restricting access?	No.
Question 5: Do you have any comments on the draft guidance about reporting or flagging mechanisms, including on Ofcom's view that reports and flagging mechanisms are central to protecting users?	No.
Question 6: Do you have any comments on the draft guidance about systems for viewers to rate harmful material, or on other tagging or rating mechanisms?	No.

Question 7: Do you have any comments on the draft guidance about age assurance and age verification, including Ofcom's interpretation of the VSP Framework that VSPs containing pornographic material and material unsuitable for classification must have robust age verification in place?

1account agrees with the interpretation that video sharing platforms containing pornographic material must have robust age-verification in place.

We believe that the distinction between age-verification and less robust age assurance controls needs to be clear in the guidance. Including age-verification within the broad age assurance approach is understood, but it risks diluting controls if what constitutes acceptable age-verification is not clearly defined. This should not be about defining technical approaches, which could soon be out of date or which would limit innovation, but establishing the principles which need to be met to ensure children cannot normally access pornographic material. It should be clear that it is age-verification which is required for those platforms carrying pornography and not forms of age assurance which can easily be circumvented or which rely solely on the user, such as self-declaration or ticking boxes.

We recognise the practical challenges which Ofcom have set out, in particular the limited number of platforms within Ofcom's jurisdiction and consequently the limited impact that the age-verification requirement may have. However, as the forerunner to the Online Safety regime, the requirements for video sharing platforms can establish best practices and steer expectations for platforms, providers of age-verification and consumers.

We welcome Ofcom's commitment to work with international regulators. While not necessarily a feature of this guidance for video sharing platforms, encouraging consistent standards and approaches, including interoperability, will make implementation for platforms easier and

	<p>ultimately benefit consumers and the objective to better protect children online.</p> <p>UK providers of age-verification and digital identity are world leaders and we encourage Ofcom to work with industry on implementation.</p>
<p>Question 8: Do you have any views on the practicalities or costs relating to the implementation of robust age verification systems to prevent under-18s from accessing pornographic material and material unsuitable for classification? Please provide evidence to support your answer wherever possible.</p>	<p>1account is an innovative digital identity and age-verification provider which is currently operating in a number of age restricted verticals including gambling and the sale of age-restricted products. We are supportive of Government measures to increase the acceptability of digital identity and to remove legislative and regulatory barriers. We welcome Government's current work on the Digital Identity and Attributes Trust Framework and believe that this work will also benefit online safety regulation in the future. It is paramount to ensure the necessarily high standards required to support providers of digital identities, to ensure users of those identities can trust the attributes they carry and share, and to protect holders of digital identities and foster the high level of trust which is fundamental.</p> <p>Security is a core component of digital identity and it's at the heart of 1account's product. 1account is built to GPG45 standards, is ISO27001 certified, is an active participant in the development of PASS standards for digital and has Primary Authority Advice Assured from Buckinghamshire and Surrey Trading Standards.</p> <p>Age-verification, including where this is achieved through the use of digital identity, can be implemented easily, quickly and with very low cost. Where cost might once have been considered a barrier for platforms, that is no longer the case.</p>

	<p>Sharing a single anonymised attribute from a digital identity to confirm an individual is 18 or older makes for a very straightforward user journey, removes friction that might be challenging for platforms, and helps address practical concerns in relation to privacy.</p> <p>We believe that the Digital Identity and Attributes Trust Framework will establish mechanisms which will further benefit providers, companies that require attributes such as age, and consumers of age-restricted content. While the Digital Identity and Attributes Trust Framework is a work in progress, we would encourage Ofcom to ensure its approach is consistent with other regulatory controls. This can help ensure that video sharing platforms benefit from the experience of other sectors that require age-gating and make implementation that much easier.</p> <p>Again, we encourage Ofcom to work closely with industry on implementation. 1account is more than happy to help by sharing its knowledge and experience.</p>
<p>Question 9: Do you have any comments on the draft guidance about parental control systems?</p>	<p>While parental controls can play a useful role, and may remain appropriate where content poses less risk, they have not proven to be a reliable means of preventing children from accessing stronger or harmful content, including pornography.</p> <p>In order to have any effectiveness, parental controls require that responsible adults take steps to set them up. We don't believe it is right that the protection of children from harmful online content be left to the uncertain digital literacy of individual adults.</p> <p>Parental controls should not be seen as a substitute for age-verification controls.</p>

Question 10: Do you have any comments on the draft guidance about the measure regarding complaints processes or on the regulatory requirement to provide for an impartial dispute resolution procedure?	No.
Question 11: Do you have any comments on the draft guidance about media literacy tools and information?	No.
Question 12: Do you have any comments on the with the draft guidance provided about the practicable and proportionate criteria VSP providers must have regard to when determining which measures are appropriate to take to protect users from harm?	No.
Question 13: Do you have any comments on the draft guidance about assessing and managing risk?	No.
Question 14: Do you have any comments on the impact assessment in Annex 1, including the potential impacts to VSPs outlined in tables 1 and 2, and any of the potential costs incurred (including any we have not identified)?	No.
Question 15: Do you have any comments on our provisional assessment that the potential costs for providers are proportionate to achieve the regulatory requirements of the regime?	No.
Question 16: Do you have any comments on any other part of the draft guidance?	No.

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