

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Question 1: Do you have any comments on Section 3 of the draft guidance on harmful material and related definitions?	Totally agree. However social media platforms have been the main outlet for harmful material rather than individual VSP's
Question 2: Do you have any comments on the draft guidance about measures which relate to terms and conditions, including how they can be implemented?	This is very much a question for the Government, OFCOM and the social media platform providers to discuss. For private or subscription VSP's – see comments below
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?	Agreed
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?	Only in cases on VSP's where relevant terms and conditions are not already in place
Question 5: Do you have any comments on the draft guidance about reporting or flagging mechanisms, including on Ofcom's view that reports and flagging mechanisms are central to protecting users?	Yes there should be a confidential means of reporting any violation, publication and/ or access to harmful material

Question 6: Do you have any comments on the draft guidance about systems for viewers to rate harmful material, or on other tagging or rating mechanisms?

There should be no rating, but a clear definition and guidelines on material which is deemed to be offensive or harmful

Question 7: Do you have any comments on the draft guidance about age assurance and age verification, including Ofcom's interpretation of the VSP Framework that VSPs containing pornographic material and material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

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.

Definitely required. Sadly, I am aware of online broadcasters and website providers where age verification is not in evidence.

For the website I own, 3-D age and identity verification is required, not only by content creators, but also from viewers. Furthermore, access to all content is by subscription only - Subscription is subject to the 3-D age verification ; website strict terms and conditions; restriction and moderation

Question 9: Do you have any comments on the draft guidance about parental control systems?

Ultimately there should be parental control, however this can only be enforced by implementing fines or prosecution on parents

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?

For the website I own, there is an online complaints procedure – matters regarding content should and always will be settled between the complainant and the Website Admin team

<p>Question 11: Do you have any comments on the draft guidance about media literacy tools and information?</p>	<p>No comments</p>
<p>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?</p>	<p>Agreed – measures should be taken proportionately according to the provider. There are some VSP’s providing access through subscription to millions of users to image and video content , in contrast to the site I own, where video is not the “main activity” or “objective” of the service</p>
<p>Question 13: Do you have any comments on the draft guidance about assessing and managing risk?</p>	<p>My comment to VSP providers is to manage risk perhaps in the same way as I have implemented risk protection on my own site. Strict and very clear Terms and Conditions - rigorous age and identity checks and procedures before allowing access to the website - allowing access only through subscription - creating an editorial or moderating regime</p>
<p>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)?</p>	<p>No, except, those VSP’s who already have in place all the required risk and protection measures should not be asked to fundamentally change this or indeed pay a fee to have something similar installed</p>
<p>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?</p>	<p>Yes, see comments in 12 and 14 above</p>
<p>Question 16: Do you have any comments on any other part of the draft guidance?</p>	<p>I feel, within the recourses of complaint mentioned in the website terms and conditions, I feel OFCOM should now be mentioned as a further arm of complaint or as an arbitrary body</p>