

Your response

Question	Your response
<p>Question 1: Do you have any comments on Section 3 of the draft guidance on harmful material and related definitions?</p>	<p>It would be extremely helpful to ensure that any definitions (including what is harmful and illegal and harmful but legal) used by Ofcom coincide with those used by other regulators.</p>
<p>Question 2: Do you have any comments on the draft guidance about measures which relate to terms and conditions, including how they can be implemented?</p>	
<p>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?</p>	
<p>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?</p>	<p>We appreciate Ofcom's approach in allowing flexibility in the way companies comply with this requirement, depending on their services, target audience and risk of exposure.</p>
<p>Question 5: Do you have any comments on the draft guidance about reporting or flagging mechanisms, including on Ofcom's view that reports and flagging mechanisms are central to protecting users?</p>	<p>Same as above.</p>
<p>Question 6: Do you have any comments on the draft guidance about systems for viewers to rate harmful material, or on other tagging or rating mechanisms?</p>	<p>We must be aware of the dangers in allowing users to rate/tag content that may have an effect on its distribution or ability to be viewed by others. It may lead to abusive behaviour. We understand this as being different from the ability for users to flag/report content, which is of course, essential to keeping platforms and communities safe.</p>
<p>Question 7: Do you have any comments on the draft guidance about age assurance and age verification, including Ofcom's interpretation of the VSP Framework that VSPs containing pornographic material and material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?</p>	<p>As above, we believe it is essential that these requirements coincide to those imposed by other regulators worldwide. Consistency will be key to the effective operationalization of these requirements.</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.	[Confidential]
Question 9: Do you have any comments on the draft guidance about parental control systems?	[Confidential]
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?	[Confidential]
Question 11: Do you have any comments on the draft guidance about media literacy tools and information?	
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?	
Question 13: Do you have any comments on the draft guidance about assessing and managing risk?	
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)?	
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?	
Question 16: Do you have any comments on any other part of the draft guidance?	