

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Question 1: Do you have any comments on Section 3 of the draft guidance on harmful material and related definitions?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>None.</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Question 2: Do you have any comments on the draft guidance about measures which relate to terms and conditions, including how they can be implemented?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>None.</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>None.</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>None.</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Question 5: Do you have any comments on the draft guidance about reporting or flagging mechanisms, including on Ofcom's view that reports and flagging mechanisms are central to protecting users?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>None.</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Question 6: Do you have any comments on the draft guidance about systems for viewers to rate harmful material, or on other tagging or rating mechanisms?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>None.</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Question 7: Do you have any comments on the draft guidance about age assurance and age verification, including Ofcom's interpretation of the VSP Framework that VSPs containing pornographic material and material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>Yoti agrees with the definitions of age assurance and age verification. In addition, Yoti agrees with Ofcom's interpretation of the VSP Framework. Given the prevalence of robust age assurance and age verification systems offered by the market, there is no reason for providers to avail themselves of inappropriate protection measures, such as self-declaration of date of birth.</p> <p>Yoti believes that the list of considerations under 4.108 is comprehensive.</p> <p>In addition, Yoti recommends the Age Assurance (Minimum Standards) Bill [HL], introduced by Baroness Kidron. It is important that age assurance measures relied upon adhere to some minimum standards.</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>Yoti is a use case of the simplicity and cost-effectiveness of implementing age assurance measures. Yoti was certified under the BBFC Age-verification Certificate, associated with the age verification provisions under the Digital Economy Act 2016. Yoti's services typically take less than half a day for content hosts to implement. In addition, as demonstrated on Yoti's website, the price of age assurance is very low.</p>
<p>Question 9: Do you have any comments on the draft guidance about parental control systems?</p>	<p>Yoti encourages Ofcom to add further information about the use of age assurance methods to implement parental control systems. For example, a robust parental control system could evaluate the age of the prospective parent, in order to preclude a person from under the age of 18 pretending to be in a role of parental responsibility and thereby enabling themselves to view age restricted material.</p>
<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?</p>	<p>None.</p>
<p>Question 11: Do you have any comments on the draft guidance about media literacy tools and information?</p>	<p>None.</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>As discussed, it is demonstrable that there are robust, simple to implement and cost-effective age assurance measures already available on the market. Yoti believes that Ofcom's guidelines are sensible and well thought out.</p>
<p>Question 13: Do you have any comments on the draft guidance about assessing and managing risk?</p>	<p>One of the risks that Ofcom draws out in the guidance is the risk of an individual's privacy being breached. However, that risk doesn't appear to form a substantive part of the draft guidance around assessing and managing risk. Yoti encourages Ofcom to add some discussion of adopting age assurance methods are privacy by design and default to the section.</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>None.</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>Yoti agrees that the costs are proportionate. As demonstrated by Yoti's transparent pricing structure, age assurance methods are inexpensive to implement.</p>
<p>Question 16: Do you have any comments on any other part of the draft guidance?</p>	<p>None.</p>