

Your response

Please refer to the sub-questions or prompts in the [annex](#) to our call for evidence.

Question	Your response
<p>Question 1: Please provide a description introducing your organisation, service or interest in Online Safety.</p>	<p>We run a number of adult websites.</p>
<p>Question 2: Can you provide any evidence relating to the presence or quantity of illegal content on user-to-user and search services?</p> <p>IMPORTANT: Under this question, we are not seeking links to or copies/screenshots of content that is illegal to hold, such as child sexual abuse. Deliberately viewing such images may be a criminal offence and will be reported to the police.</p>	<p><i>Is this response confidential? – Y / N (delete as appropriate)</i></p>
<p>Question 3: How do you currently assess the risk of harm to individuals in the UK from illegal content presented by your service?</p>	<p><i>Our staffing level is high for the traffic that we have. It means any illegal content would likely be removed very quickly. Sometimes within minutes. We're in a different position to the very big sites which have traffic in the millions of people a day as those sites often don't get around to removing content quickly. Their staff can struggle to keep up. I once reported something posted online by someone in prison serving a life sentence and it took a week before the content was removed.</i></p>
<p>Question 4: What are your governance, accountability and decision-making structures for user and platform safety?</p>	<p>ALL STAFF MEMBERS have full authority to remove content. That is key. Also important is that they can hide content without removing it. In other words, if unsure they can 'unapprove' content and discuss the matter with other staff members, and then 'approve' the content again if that is the final decision. Being able to</p>

	hide content without actually removing it means that anything even remotely questionable can be taken away from public view whilst the matter is considered.
Question 5: What can providers of online services do to enhance the clarity and accessibility of terms of service and public policy statements?	<i>Is this response confidential? – Y / N (delete as appropriate)</i>
Question 6: How do your terms of service or public policy statements treat illegal content? How are these terms of service maintained and how much resource is dedicated to this?	<i>We prohibit a great deal more than illegal content. There are some things we just don't want, even if perfectly legal. We do spend a fair amount of time on content directives and see it as a high priority, but not because of illegal content. We really haven't had much issue with illegal content and therefore not much resource is dedicated to illegal content specifically.</i>
Question 7: What can providers of online services do to enhance the transparency, accessibility, ease of use and users' awareness of their reporting and complaints mechanisms?	<i>Is this response confidential? – Y / N (delete as appropriate)</i>
Question 8: If your service has <i>reporting or flagging</i> mechanisms in place for illegal content, or users who post illegal content, how are these processes designed and maintained?	<i>These processes are designed so that EVERY piece of content posted has its own report button. As for maintenance, every report made can automatically be seen by ALL STAFF MEMBERS.</i>
Question 9: If your service has a <i>complaints</i> mechanism in place, how are these processes designed and maintained?	<i>Is this response confidential? – Y / N (delete as appropriate)</i>
Question 10: What action does your service take in response to <i>reports</i> or <i>complaints</i>?	<i>ALL STAFF MEMBERS have full authority to deal with reports and complaints, which helps speed the process. As mentioned above, if the matter isn't clear-cut the content can be 'hidden' until a final decision is taken.</i>

<p>Question 11: Could improvements be made to content moderation to deliver greater protection for users, without unduly restricting user activity? If so, what?</p>	<p><i>The only way we could provide greater protection for users is to put someone 'on moderation' which means that any content posted by that individual would have to be approved before becoming public. However, this does restrict user activity and generally doesn't go down well with the person concerned, so it's used sparingly.</i></p>
<p>Question 12: What automated moderation systems do you have in place around illegal content?</p>	<p><i>Some words are automatically blocked, but generally we aren't concerned too much with automatic moderation. It does help but it's used more for automatically blocking spam than illegal content. As we have a high staffing level, automatic moderation is not needed that much.</i></p>
<p>Question 13: How do you use human moderators to identify and assess illegal content?</p>	<p>The key thing to us is to have a high staffing level for the traffic that we have. It means that human moderators are not overworked and have plenty of time to identify and assess illegal content. As mentioned a couple of times already, the ability to 'unapprove' content without removing it makes it easy for human moderators to discuss things with each other. In many cases our human moderators work as a team to reach a final determination.</p>
<p>Question 14: How are sanctions or restrictions around access (including to both the service and to particular content) applied by providers of online services?</p>	<p><i>Is this response confidential? – Y / N (delete as appropriate)</i></p>
<p>Question 15: In what instances is illegal content removed from your service?</p>	<p>Every staff member has full authority to remove content. It doesn't have to be illegal, just content that we don't want. Our moderators tend to err on the side of caution, so basically if they think something's illegal it would get removed. We don't knowingly take chances. It doesn't have to be reported either. Our moderators aren't waiting to see whether content gets reported. If they see undesirable or illegal content they will remove it.</p>
<p>Question 16: Do you use other tools to reduce the visibility and impact of illegal content?</p>	<p><i>Some words are automatically blocked, as mentioned earlier. People can also be put 'on moderation' as also mentioned earlier, although if someone posted clearly illegal content their account would likely be terminated anyway.</i></p>

<p>Question 17: What other sanctions or disincentives do you employ against users who post illegal content?</p>	<p><i>We have a warning system. It works similar to penalty points on a driving licence, i.e. accumulating so many points leads to a ban, although most people tend to heed such warnings and don't get banned in this way. This system is mainly used for fairly minor indiscretions. As mentioned in the last question above, if someone posted clearly illegal content their account would likely be terminated outright.</i></p>
<p>Question 18: Are there any functionalities or design features which evidence suggests can effectively prevent harm, and could or should be deployed more widely by industry?</p>	<p><i>Is this response confidential? – Y / N (delete as appropriate)</i></p>
<p>Question 19: To what extent does your service encompass functionalities or features designed to mitigate the risk or impact of harm from illegal content?</p>	<p><i>I think this has been answered under questions 16 and 17.</i></p>
<p>Question 20: How do you support the safety and wellbeing of your users as regards illegal content?</p>	<p><i>Basically by having a high staffing level and the promptness that comes with that. By internet standards, our staffing level is high for the traffic that we have. It means any illegal content is likely to be removed very quickly.</i></p>
<p>Question 21: How do you mitigate any risks posed by the design of algorithms that support the function of your service (e.g. search engines, or social and content recommender systems), with reference to illegal content specifically?</p>	<p><i>Simply by the speed with which we act. Illegal content would not be on any service run by us for very long. The speed with which we act means such risks are minimal.</i></p>
<p>Question 22: What age assurance and age verification technologies are available to platforms, and what is the impact and cost of using them?</p>	<p><i>Age verification has been a big problem for us. The technologies exist for sure but the currently available technologies are not affordable for us. If we kept the same traffic level with age verification that we had previously, the bill for age verification would actually be greater than our turnover. So clearly the currently available solutions are not practical for us. I would add</i></p>

that we cannot pass the cost of age verification onto our users, as all sites run by us are 'free' sites. In other words, our sites are 'ad supported', meaning that they are viable through advertising rather than the users having to pay anything to access a service. I'd like to repeat that if our traffic with age verification remained at the same level, then the cost of utilising an age verification service would actually be higher than our turnover. The fact that our users don't pay us anything is a big problem when it comes to age verification and puts us in a position which is way different to pay sites.

If we could get over the cost issue we would still have to face the impact of age verification on our traffic. Unfortunately we don't know exactly how big the impact would be, but no doubt our traffic would take a substantial hit. The internet is a big place and there are always alternatives. It would be hard for us to compete with sites which didn't have to age verify. Incidentally, just recently I had to age verify myself. I wasn't going to bother, but I had promised someone that I would sign up to a certain service, so I had to go through with it. If I had a choice I wouldn't have bothered and that is the big issue. I age verified because I really had to, to keep my word to a business associate, but how many people would age verify if they didn't have to?

I would emphasise here that in talking about the impact of age verification I am talking about the impact on 'free' sites. For pay sites things are much different.

For free sites I would anticipate that the loss of traffic would be huge, for the simple reason that free sites live or die by casual traffic.

The age verification process I went through recently involved uploading my passport and also using my mobile phone to take a photo of my face. I can't imagine much casual traffic being willing to go through that.

As I said, free sites live or die through casual traffic, which means that with age verification it would be difficult to survive.

Things would be different of course if age verification was a simple thing, but based on what's currently available it isn't a simple thing.

<p>Question 23: Can you identify factors which might indicate that a service is likely to attract child users?</p>	<p><i>Is this response confidential? – Y / N (delete as appropriate)</i></p>
<p>Question 24: Does your service use any age assurance or age verification tools or related technologies to verify or estimate the age of users?</p>	<p><i>I wish it was possible, but due to both complexity and cost issues age verification is a nightmare for us. If only there was a practical solution available. If only there was something which was easy for the user to use and which was financially viable for us.</i></p>
<p>Question 25: If it is not possible for children to access your service, or a part of it, how do you ensure this?</p>	<p><i>Is this response confidential? – Y / N (delete as appropriate)</i></p>
<p>Question 26: What information do you have about the age of your users?</p>	<p><i>Is this response confidential? – Y / N (delete as appropriate)</i></p>
<p>Question 27: For purposes of transparency, what type of information is useful/not useful? Why?</p>	<p><i>Is this response confidential? – Y / N (delete as appropriate)</i></p>
<p>Question 28: Other than those in this document, are you aware of other measures available for mitigating risk and harm from illegal content?</p>	<p><i>Is this response confidential? – Y / N (delete as appropriate)</i></p>