

Consultation response form

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

Consultation title	On-demand programme services: Consultation on guidance for ODPS providers on measures to protect users from harmful material.
Full name	
Contact phone number	
Representing (delete as appropriate)	Organisation
Organisation name	BT PLC
Email address	

Confidentiality

We ask for your contact details along with your response so that we can engage with you on this consultation. For further information about how Ofcom handles your personal information and your corresponding rights, see [Ofcom's General Privacy Statement](#).

Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential? Delete as appropriate.	Nothing
Your response: Please indicate how much of your response you want to keep confidential. Delete as appropriate.	None
For confidential responses, can Ofcom publish a reference to the contents of your response?	Yes

Your response

Question	Your response
Question 1: Do you have any comments on proposed guidance around subsection 1 of section 368E of the Act – material likely to incite violence or hatred?	Confidential? – N - All our 3 rd party content is BBFC checked.

<p>Question 2: Do you have any comments on proposed guidance around subsections 2 and 3 of section 368E of the Act – prohibited material?</p>	<p>Confidential? – N</p> <ul style="list-style-type: none"> - All our content is BBFC rated - Our system will not publish content without it having a rating.
<p>Question 3: Do you have any comments on proposed guidance around subsections 4 - 7 of section 368E of the Act – protection of under-18s (specially restricted material)?</p>	<p>Confidential? – N</p> <ul style="list-style-type: none"> - We do not provide R18 content on our platform. - We have a combination of restrictions specific to Adult content, age rated and Watershed. - We have mandatory daytime pins in place for NowTV to restrict access on post watershed content that may be viewed pre watershed (across Entertainment and Cinema). - All our content is BBFC rated. - We have content warnings and programme information in place. - Some VOD apps have their own parental controls. For example Netflix and Amazon Prime Video have cross-platform parental controls. - Some players block access when Parental Controls are switched on. For Example Netflix and Amazon. - Some players block individual content when Parental Controls are switched on. For example BBC iPlayer and ITV Hub. - We use a combination of these controls across the BT TV Box.
<p>Question 4: Do you have any comments on any other part of the proposed guidance which is not explicitly set out in questions 1-3?</p>	<p>Confidential? – N</p> <ul style="list-style-type: none"> - It would be good to understand the restrictions and measures required around potentially carrying user created content platforms on our box such as twitch. As BT would be the gateway to access this content, would we therefore be responsible for having certain measures and controls in place on the box or would this be a requirement of the content provider?
<p>Question 5: Do you have any comments on the impact assessment in Annex 1, and any of the potential costs incurred (including any we have not identified)?</p>	<p>Confidential? – N</p> <ul style="list-style-type: none"> - We don't currently have an age assurance method, such as age verification. However the current controls we have in place do sufficiently protect under 18s from specially restricted material. A mandating of age assurance measures



may have a financial impact dependant on the solution required.