Good Practice Principles on Audiovisual Content Information: One Year On

BSG
Broadband Stakeholder Group

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Background

The Good Practice Principles on Audiovisual Content Information were developed to ensure that consumers are able to make informed choices about the content they access in a fast-moving media environment. They were launched in February 2008.

The Principles apply to commercially produced and acquired content that may be unsuitable for children and young people and which may be harmful or offensive more generally.

The 5 Principles are:

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1. Providers are committed to promoting and enabling media literacy through the provision of content information. The providers' respective approaches to these principles reflect that commitment.

2. Providers offer content information in order to empower users and allow them to make informed choices about the content that they and their families access/consume/watch.

3. Providers offer information about content that may be harmful or offensive to the general public, and that may be unsuitable for children and young people. In particular, content information is designed to enable parents and carers to exercise supervision over the content viewed by those they are responsible for.

4. Providers employ editorial policies that reflect the context in which their content is delivered. These policies aim to guide users about the content that is available on a particular service so that they can make an informed choice about what to view or not view.

5. While the exact format of the information may vary from provider to provider according to context, providers aim to present it in a way that:

- is easy to use and understand
- gives adequate information to enable the user to make an informed choice about whether or not to access the content
- uses plain and consistent language, practical for the medium in which it is made available.

The following companies and organisations committed to the Principles at launch:

AOL, BBC, Bebo, BT, Channel 4, Five, Google, ITV, Microsoft, Mobile Broadband Group (represents Orange, O2, 3, T-Mobile, Vodafone and Virgin Mobile)**, Teachers TV, Virgin Media, Yahoo!, ATVOD (**Association for Television on Demand**), FOSI** (Family Online Safety Institute) and **BBFC** (British Board of Film Classification).

Since launch, the following companies have also committed to the Principles:

BSkyB, MySpace and **Tiscali**.

The purpose of this document is to give an update on how the Principles have worked in practice and an overview of the challenges and issues involved with providing information about content in a fast-paced and continually evolving media environment.

How the Principles are being met
Content providers and aggregators are using a mix of formats, technical tools and editorial policies so that the consumer is provided with content information that is easy to use and understand.

Tools being used include visual symbols, long form text information, age classifications and ratings, parental controls such as PIN protection or other access controls, visual or audio warnings and age verification processes.

Appendix 1 contains an overview from signatories about how they are working to meet the Principles in practice.

The rationale behind the Principles
When the Principles were being developed, it was seen to be of fundamental importance that they allowed for content information to be provided in a way most appropriate to the context in which the content was being made available and in a way that was practical for the medium in which it was made available.

This view was developed from the experience of signatories in understanding their users' needs and is supported by the findings of research[1] that demonstrates that whilst consumers value information about content, there is no expectation that it is offered in a uniform way across different platforms.

Experience of the linear age demonstrates that consumers respond to different formats of information for different types of content, for example age-rating systems for cinema and video content and pre-broadcast announcements for television programmes.

This experience indicated that a media environment involving different types of content across an increasing range of platforms could therefore be flexible in its approach to content information. The over-riding objective is to provide and facilitate content information that makes sense to consumers in the context in which it is made available and on the platform on which it is accessed.

In light of this, the approach advocated in the Principles and reflected by the variety of ways in which content information is being provided to the consumer by the signatories, allows for a range of approaches for the provision of content information.

What is common amongst all approaches is a commitment to provide information about potentially harmful or offensive content that is easy to understand and use.

The experience of employing this approach
A year on from the publication of the Principles, the process of developing guidelines has been effective in stimulating cross-industry engagement in the extension of content information into many online environments.

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[1] Ofcom Programme Information Research, 6 September 2006

Furthermore, the addition of three new signatories to the Principles in the past year demonstrates the growing importance of content information as a core tool deployed by content providers and aggregators to help consumers navigate digital content effectively.

As the Principles are just one year into existence, it is still very early to provide a fully comprehensive assessment of their impact and effectiveness. No formal research has been undertaken to test consumer understanding of and reaction to content information, and this may be a useful exercise for the future.

Viewing the Principles in the wider policy context, it would appear that other policy developments reinforce the approach and rationale that underpin the Good Practice Principles:

- The text of the Audiovisual Media Services Directive does not require uniform standards between broadcast and other media, and recognises the qualitative differences between the different types of content and the way in which it is delivered.
- Discussions in the UK and at a European level on "common labelling standards" and a "pan-European cross-media rating system" have been abandoned as these approaches have been regarded as unworkable and ineffective following consultation exercises.
- Tanya Byron in her review, *Safer Children in a Digital World* recognised the development of the Good Practice Principles as an example of how the role that self-regulation can play in the development of industry best practice.
- The interim Digital Britain report advocates a focus on education and empowerment in ensuring that individuals have the skills and understanding to navigate the digital world safely and effectively. This is a goal shared by the signatories to the Good Practice Principles.

Core observations
One key observation that has been highlighted by the operation of the Principles in their first year is that the exact role that signatories play in the content value chain influences how they apply the Principles. This often depends on the relationship that exists between the signatory and the nature of the content involved. For example:

- Where content is produced, commissioned, hosted or broadcast by the signatory, the signatory may either attach content information to this content on their own platforms, or attach content information to the content when uploading it to a third party's platform.
- Where content has been created by a third party and is displayed on a signatory's open platform, signatories are able to encourage third parties to utilise tools to attach content information to their content.
- Platform owners may rely on content creators to attach content information before the content is released for distribution or on their own intervention to label the content for their audience where this is possible and practicable.
- Where sectoral guidance or additional good practice or self-regulation exists, content labelling is typically labelled by the content creator as a matter of course so labelling tends to be consistent regardless of where it is distributed or consumed by the end user.

This reality means that there will always be a challenge in ensuring that as much potentially harmful or offensive content as possible is suitably flagged to the consumer. With the increased levels of content available across a wider variety of platforms, from an international range of sources and increasingly from non-traditional providers, the pure volume of available content presents a challenge of scale. A key way to meet this challenge is to extend good practice throughout the content value chain.

Next steps

As the availability of content increases, both in terms of pure volume and through the platforms and devices on which it is available, it is important to view this issue as an international one, where self-regulatory initiatives such as these Principles can play an important role.

In light of this, going forward, the BSG and the signatories to these Principles will:

- Continue to promote them to the sector with a view that they permeate throughout the content value chain.
- Engage with policy makers to discuss the role that these Principles play in empowering consumers to navigate the digital world.
- Evaluate and review the role of these Principles as the content market continues to evolve and grow.

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Annex 1: An overview of the experience of signatories in working to the Principles

AOL
- AOL has pre-defined categories for specific age groups and allows parents to tweak those to the level which they deem appropriate for instant message use, to internet browsing to setting online time limits.
- All trailers shown by AOL are U rated even if the film is for an older audience and promoted films are presented to include their BBFC rating.
- AOL also offers specific channels for kids and teens with age appropriate content, accompanied by stringent advertising policies.

BBC
- The BBC uses the 'G' for Guidance system on the BBC iPlayer service to give information about content containing challenging material that may be unsuitable for children or young people or may cause more general harm or offence.
- Such content displays a visual 'G' symbol, alongside a short text description giving more detail on the nature of the content, for example "contains strong language", "contains adult humour".
- A PIN/password protection service is also available on BBC iPlayer to allow users and parents to set a pin or password to access content that has been labelled "G" for Guidance and installation of the BBC iPlayer download manager is restricted to those aged 16 or over.

BBFC
- The BBFC makes available its classifications to label an array of new media content through its BBFC.online scheme.
- The BBFC.online scheme provides for, and requires, all of the following: the classification of video content using the same ratings as for film and DVD; the provision of bespoke, text based content advice for each piece of video content; the implementation of effective age verification measures to ensure that age restricted material is not supplied to those under age and independent monitoring of compliance with the scheme rules.

Bebo
- Bebo's Commercial Content Standards outline to its professional content partners the type of content that is prohibited from appearing on Bebo; content that needs to be age-restricted (strong content); and content that requires a guidance label (challenging content).
- Bebo provides its partners with the ability to label and manage their content, while partners are ultimately responsible for ensuring that their content complies with Bebo's standards.

BSkyB
- Sky provides a wide variety of controls for linear services on the Sky platform, including the ability to require PIN entry to access the entire adult genre, or individual channels, in addition to the ability to restrict viewing of age rated content.
- A number of these controls can be applied to content recorded on the Sky+ PVR service and to content accessed either via the Sky Anytime service or the online Sky Player service.
- Sky applies appropriate watersheds to content made available on the Sky Anytime service to facilitate parental controls, in addition to providing age ratings for all movies.
- Content listed in the online Sky Player service can be age rated with information on when the programme might normally be scheduled in order to assist parents in

assessing the appropriateness of the content. Parental controls can be applied to content in each service restricting access to particular aged-rated material.

- In addition to other parental controls, Sky's platform supports detailed programme information allowing all broadcasters to provide clear guidance to parents where appropriate. Programme information in Sky Player includes additional text warnings where appropriate, e.g. "Parental Guidance: Very strong language".

BT
- BT Vision has a parental locking system that allows parents to control what their children can watch. Parents can decide which programmes are unsuitable for their children, and make them accessible only with a PIN.
- BT Vision supplies a clear synopsis of every programme able to be read before customers chooses to press play.
- BT Vision gives every programme an age rating to advise on the suitability of content and every film is given a rating based on the British Board of Film Classification to ensure parents are aware of the suitability of content.
- BT provides all consumer ISP customers with a comprehensive parental controls service at no extra cost. This enables parents to simply choose from pre-defined age categories or to create individual controls for each child.
- BT is committed to applying inclusive design as a way of ensuring that products and services benefit the widest possible audience. In conjunction with Cambridge University we have produced an inclusive design toolkit - www.inclusivedesigntoolkit.com - which helps designers apply the principles of inclusive design to their work.
- BT is the first major UK company to provide a British Sign Language section on our website.

Channel 4
- All consumers are required to register with 4oD once the application has been downloaded onto their PC and they have selected a programme to watch. At the point of registration they are required to confirm that they are over 18.
- At the point of registration, users are given an option to apply PIN protection and if they select this, a PIN is required every time that they use the 4oD service.
- All 4oD users, including those that activate the PIN and those who do not, are provided with programme information.
- The 'G' for Guidance system is applied to content that would have received an on-air warning. This includes the display of a visual 'G' symbol, text information about the content of the programme, and where appropriate, the original date and time of transmission on the linear service.
- Catch-up content on channel4.com also uses the 'G' for Guidance system to flag post-watershed material and to provide guidance information. It requires users to confirm that they are over 18 years age to access such material, while also making available a PIN/access control service.

Five
- It is necessary for consumers to register with Demand Five in order to watch programmes that are marked with 'G' for Guidance, flagging challenging content.
- In registering with Demand Five consumers need to declare that they are over 18. After which, it is possible *either* to watch all programmes without further notification *or* to set a four digit PIN number which is thereafter required to view all 'G' rated programmes.
- The nature of the guidance is displayed prominently as part of the listing for each programme. The original date and time of the programme's transmission on a Five channel is also displayed, for 30 days after broadcast.

Google
- YouTube's community guidelines make clear the acceptable boundaries for hosted videos. Partners are responsible for labelling and managing their content and complying with the guidelines.
- Users can easily report videos they believe to breach the guidelines, and videos in breach will quickly be removed. Material not in breach of the community guidelines, but not suitable for younger audiences is age-restricted to users over 18.
- The YouTube safety centre gives detailed advice and guidance to users on a range of topics, including what to do if you come across harmful or offensive content.

ITV
- ITV uses the 'G' for Guidance system on its on-demand service ITV.com and the 'G' content advice appears as users move the mouse over a particular programme's icon. It is not possible to open the selected programme without the advice box appearing.
- A PIN access control system is also available. This enable parents and users to PIN protect post-watershed content, meaning that any content originally broadcast after the watershed will require PIN access every time such material is selected for viewing from that computer.

Microsoft
- Microsoft has developed a family guide to interactive gaming, *Play Smart, Play Safe*, which details the various tools to inform and manage children's access to gaming content.
- This guide includes information about age ratings for games that help parents make decisions about which games are suitable for their children. In the UK, Microsoft uses a mix of British Board of Film Classification (BBFC) and Pan-European Game Information (PEGI) ratings. PEGI age ratings (3+, 7+ and 12+) and BBFC age ratings (15 and 18) are displayed alongside PEGI descriptor symbols that highlight various types of content that may be unsuitable for children or offensive such as bad language, violence and fear.
- Alongside this, Microsoft offers a range of parental controls. Family Settings are available on every Xbox 360 console, allowing games to be restricted by PEGI rating and films to be limited to certain rating levels.
- Across the Xbox and Windows Vista, other settings are also available, which allow parents to manage various aspects of their children's engagement such as whether they can participate with interactive online games, can download content, who they can communicate with online, how much time per day they can spend on the console.
- These settings are supported by other initiatives, such as the PACT, an acronym for Parental Involvement, Access, Content and Time, which encourages parents to make an agreement around the rules and limits of gaming in the household.
- In addition to the specific tools for gaming, Microsoft offers a range of mechanisms across its services that can help parents make choices about the type of content they and their families wish to access in the household. For example, tools are available on Hotmail and MSN Messenger that require parental approval before children communicate with new contacts and on Windows Vista to block access to websites by content type or only allowing access to certain sites.

Mobile Broadband Group
- Members of the Mobile Broadband Group (Orange, O2, 3, T-Mobile, Vodafone and Virgin Mobile) adhere to the Principles through compliance with the MBG's code of practice[2]. For example, they use age verification tools and access controls to ensure

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[2] UK Code of Practice for the self-regulation of new forms of content on mobile

that access to content that has been classified 18 under the Independent Mobile Classification Body (IMCB)'s Classification Framework, is restricted until customers have verified their age as 18 or over.

- Since its inception the IMCB has received only one complaint regarding mis-classification of content, which was resolved quickly with the service provider agreeing to adjust the content accordingly.
- With respect to customers' direct interaction with content supplied by mobile operators within their content portals, each operator offers information about the nature of a category of content and, if required, gives a text description. For example, the humour category may be headed as "some content may cause offence".
- In relation to content available on the internet, which may be accessed by a mobile phone, mobile operators offer parents the opportunity to apply a filter to the mobile operator's internet access service so that internet content is restricted. The filter is set at a level that is intended to filter out content approximately equivalent to commercial content with a classification of 18.
- This approach is supported by wider initiatives to raise awareness about accessing content through a mobile, such as input into the creation of third party resources such as Childnet International's 'New Mobile Services' pamphlet.

Teacher's TV
- The Teacher's TV website provides clear information about the intended audience and the nature of content provided. In addition, the editorial policies deployed reflect the expectations of the audience.
- Teacher's TV provide a full synopsis for each programme and where an individual programme contains content that the viewer might not expect (for example graphic images of war or strong language) the synopsis is accompanied by a clear text description flagging this. Teachers are advised to view a programme in full before showing it to a class.
- No complaints have been received to date regarding unsuitable programming or misleading information about programmes.
- A content labelling system for every programme is currently being explored, consisting of a visual symbol and corresponding description.

Tiscali
- Tiscali.co.uk provides text-based descriptions for videos on the website and where appropriate to flag content with strong language, adult content or disturbing scenes.
- Tiscali.co.uk is in the process of introducing "G" for Guidance on the website.
- Tiscali TV uses a PIN system, where each member of the household can have their own PIN with entitlements based on their date of birth.
- All on-demand content is rated with an age based classification system similar to the BBFC from U to 18, plus adult.
- In the case of adult content this requires entry of an over 18 PIN to access the content every time. For all other content a PIN need be entered only once to identify the user and their age.

Virgin Media
- Virgin Media uses a range of tools to provide content information about the various services offered on its On Demand service, which includes access to films, television shows, music videos, the BBC iPlayer service and Catch Up TV (highlights from the last 7 days' shows).
- All On Demand films on the Virgin Media platform contain text labelling which describes the content of the film. All films are reviewed and classified by ex-BBFC examiners to

ensure any material that is potentially offensive or harmful to children is suitably assessed and labelled.

- All On Demand content, save Catch Up TV, contains an age rating and the majority of On Demand content also contains a text label. Customers accessing the BBC iPlayer via the Virgin Media platform are presented with its 'G' for Guidance system (as outlined above).

- Virgin Media also sets a mandatory PIN and by default, all content rated '12' is PIN protected on the Virgin Media Platform if viewed before 8pm, all content rated '15' is PIN protected before 9pm and '18' rated content is PIN protected before 10pm. In addition, there is also the option for consumers to set the level of PIN protection so that the PIN is required before viewing all rated content.

- All adult content on the platform is PIN protected, even to browse titles and the PIN has to be entered once again before making a purchase or tuning back after having tuned to another channel. Parents and consumers can also choose to hide the adult listings from the Electronic Programme Guide (EPG) and "lock access" to adult channels.

- On virginmedia.com, extracts from TV programmes and other editorial content available on the site and deemed inappropriate for those under 18 is scheduled after 9pm and users are also notified via a pop-up dialogue box which asks users to confirm they are 18+ before the content is shown.

- Virgin Media highlights how users can make use of the content information on offer, particularly the PIN protection service, through requiring installers to talk new customers through the PIN process, publishing details in its "Play" magazine (sent to 3.5 million digital TV customers) and including information on the "Help and Information" pages on the digital TV service, which was updated and given more prominence in Q4 2008.

Yahoo!
- Yahoo! aims to present content that is suitable for all audiences. Where the Principles recommend labelling, there are a range of tools in place to ensure that as much content as possible is labelled.

- We have built relationships with existing content partners and allow them to label content at source and have introduced standard contract clauses to this effect for new suppliers.

- Film and games trailers are typically labelled at source as an industry standard so users know what to expect before viewing a trailer. Downloadable games are pre-labelled by our supplier.

- TV trailers and TV content repurposed for online distribution are typically suitable for all audiences. Where a genre may merit a specific warning to users, content can be placed in a channel and the channel labelled with an appropriate guidance note.

- If content has been supplied unlabelled but Yahoo! or the user would reasonably expect it to be, we have an ability to take down content once we are aware that these expectations are not met.