

Written evidence submitted by the British Board of Film Classification (COR0133)

Executive Summary

1. The BBFC is the independent regulator of film and video in the UK. We also regulate, on a voluntary, best-practice basis, content delivered via the UK's mobile networks.
2. With everyone currently at home and watching more content than usual, the BBFC is here to support parents, children and all audiences as they choose the content they want to watch. We very much welcome this opportunity to submit to the Home Affairs Committee's inquiry.
3. Our recent research (published 4 May 2020) has found that almost half of UK children have seen content they would rather avoid while in lockdown, leaving them feeling uncomfortable, scared and confused, with one in seven saying they see harmful content every day. Now more than ever, staying safe online and learning how to avoid content that might upset or disturb is crucial for children's healthy development and parents' peace of mind. The Home Office needs to work cross-departmentally with DCMS and the Department for Education and with key stakeholders including the BBFC to ensure that resources are available to parents and children to stay safe online during lockdown.
4. The BBFC's key initiatives relevant to the inquiry are:
5. **We have a wealth of free resources available on our website.** Our research shows that children would value their parents talking to them during lockdown to help avoid distressing content. BBFC has free, easily accessible resources online to assist parents to have these conversations. These include educational resources to help parents homeschool their children during lockdown as well as trusted age ratings and ratings info for films and TV series. The UK Government and leading children's charities including Barnardo's, Childnet and the PSHE Association have welcomed these resources.
6. **We have brought our trusted age ratings online.** In 2018, 90% of parents told us they believe it important to display age ratings online. 92% said streaming platforms should show the same age ratings audiences would expect at the cinema or on DVD. With online platforms seeing a surge in users during lockdown¹, this is more vital than ever. Since 2008, the BBFC has worked in partnership with the home entertainment industry and others to achieve parity online and offline, with online classifications on a voluntary, best practice basis. One prominent example is our partnership with Netflix, in which we are jointly working towards 100% coverage of BBFC age ratings on the platform in the UK. BBFC ratings can also be linked to parental filters, which 87% of parents say they want in order to help protect their children from inappropriate content.
7. **We are calling on video sharing platforms to consider using trusted BBFC signposts for user generated content.** 82% of parents and 73% of children want to see trusted BBFC age ratings displayed on platforms like YouTube, so they can navigate user generated content more safely. The BBFC believes that through a combination of uploader self-labelling and large scale crowdsourced feedback, it is possible to generate clear, effective labelling for all content on video sharing platforms without disrupting the user journey. The BBFC is seeking partners to co-

¹ <https://www.bbc.co.uk/news/business-52376022>

develop such tools and processes.

8. **With traffic to online pornography sites up during lockdown², we support the introduction of age-verification to restrict this content to adults only.** There are several age-verification solutions ready to be deployed and our research indicates broad public support for the introduction of such controls, with 83% of parents in favour.
9. We would be happy to discuss any of the initiatives raised in our submission with the Committee.

1. About the BBFC

10. The British Board of Film Classification (BBFC) is the non-governmental, not-for-profit independent regulator of film and video in the UK.
11. The BBFC's primary aim is to protect children and other vulnerable groups from harm through classification decisions which are legally enforceable and to empower consumers, particularly parents and children, through the provision of content information and education, enabling families to choose content well, wherever, whenever and however they view it.
12. The BBFC operates a transparent, trusted classification regime based on years of expertise and published Classification Guidelines. We conduct regular large scale public consultations to ensure the Guidelines accurately reflect societal standards and parental expectations. Our latest consultation, in 2018, demonstrated that the public agrees with the BBFC's classification decisions more than 90% of the time.
13. The BBFC welcomes this opportunity to respond to the Home Affairs Committee and agrees with the Government that it is important to deal with the fundamental challenge of harmful content and activity online, particularly in terms of protecting children and the vulnerable. To successfully address this challenge, the BBFC believes we need to work towards ensuring that what is unacceptable offline should be unacceptable online.

2. Children's exposure to harmful content during lockdown

14. During lockdown, children are spending more time online, inevitably with less adult supervision. It is hard for parents to know what their children are watching online at the best of times, but now it is even more challenging. And while the internet is an invaluable tool for education and entertainment during lockdown, increased online access also brings increased dangers – as evidenced by stark reports from Barnardo's³ and the Internet Watch Foundation (IWF)⁴ highlighting the growing risk of children being groomed and exploited online.

² <https://bit.ly/35WDFv2>

³ <https://www.barnardos.org.uk/news/barnardos-warns-parents-online-dangers-children-schools-close>

⁴ <https://www.iwf.org.uk/news/children-may-be-at-greater-risk-of-grooming-during-coronavirus-pandemic-as-iwf-braces-for>

15. In their annual report⁵, published 14 May 2020, Report Harmful Content (RHC), the UK's national reporting centre for harmful online content, found a correlation between poor mental health and viewing harmful online content, including graphic/violent content, self-harm/suicide content and pornography. 32% of RHC clients described viewing such content, often inadvertently, as having a negative impact on their mental health. In the Home Affairs Committee's evidence session on 13 May 2020, the Minister of State for Digital and Culture, Caroline Dinenage MP, noted that during lockdown charities have been receiving an increased volume of calls to their helplines relating to children's mental health and online safety.
16. Our own research, conducted by YouGov⁶ on behalf of the BBFC, has revealed that nearly half (47%) of children and teenagers have seen content they would rather avoid while in lockdown, leaving them feeling uncomfortable (29%), scared (23%) and confused (19%).
17. One in seven (13%) said they see harmful content on a daily basis in lockdown, with 14 year olds exposed to the most. A quarter (24%) of 14 year olds say they see harmful content each day.
18. This comes as more than half (53%) parents say they have not spoken to their children about their increased time online during lockdown, with a third (29%) saying they did not think such a conversation would make a difference.
19. This research supports the Government's recognition of the need to help families stay safe online, with guidance recently issued containing the four-point plan including reviewing security and safety settings, checking facts and guarding against disinformation, being vigilant against fraud and scams, and managing the amount of time spent online.

3. Current measures to mitigate these concerns

20. The BBFC is an expert in online and offline harms in relation to content. The purpose of our age ratings and content advice is to protect children and vulnerable adults from potentially harmful or otherwise unsuitable media content and to empower consumers to make informed and safe viewing decisions.
21. This is more true during lockdown than at any time before. Today, children need to be able to make the right decisions for themselves. So our expert advice and straightforward tools that help families decide what to watch with confidence are more relevant than ever.

BBFC education resources

22. Parents can make a real difference to reducing their children's risk of being exposed to unsuitable material online if they talk to them about how to avoid potentially distressing and inappropriate content. From our research, 60% of children say they have approached their

⁵ https://d1afx9quaogywf.cloudfront.net/sites/default/files/RHC_Report_final%20%282%29_0.pdf

⁶ All figures, unless otherwise stated, are from YouGov Plc. Sample size was 638 children and 1,020 adults. Fieldwork was undertaken between 24 and 28 April 2020. The survey was carried out online. The figures have been weighted and are representative of all GB children (aged 6 to 15) and all GB parents with children aged 18 and under.

parents to chat after seeing content that has upset or disturbed them while they've been online in lockdown.

23. The BBFC is supporting parents to help their children to navigate the online world safely, and to choose content well. We know that using age appropriateness as a guide to what's suitable plays a valuable part in helping children, young people, carers and parents navigate the film, video and website content around them. We are encouraging all parents to have open, frank and honest discussions with their children about what they're watching online.
24. With increased time spent online, we must ensure that children have the tools they need to choose content well. Our homeschooling initiative – supported by Government and leading children's charities including Barnardo's, Childnet and the PSHE Association – gives parents free, easily accessible, curriculum-based resources through our website to help them educate their children while at home. On our social media accounts (Facebook, Twitter, Instagram) we are also pointing to family friendly, educational shows to stream, and we have launched movie packs so that families can watch films together and discuss them afterwards. These educational resources also help children develop resilience, and get them thinking about how their choices affect them and those around them. We are working with the Welsh government to make our education resources available in both English and Welsh via their education portal, Hwb.

BBFC age ratings and ratings info

25. The BBFC classifies content according to the standards set out in our Classification Guidelines. The BBFC also publishes 'ratings info' which gives a detailed breakdown of the issues that result in a particular classification, as well as other issues likely to be of relevance to viewers. Parents and young people can check our age ratings and ratings info on the BBFC website and free app.
26. Demand for clear content labelling has never been higher, with 97% of people saying they benefit from age ratings being in place, and the need for the same offline standards to apply online has been a recurring theme in BBFC consultations. In 2018, 91% of people (and 95% of teenagers) told us they want consistent age ratings that they recognise from the cinema and DVD to apply to content accessed through video on demand (VOD) services such as Netflix and Amazon.
27. In response to public demand for parity online and offline, since 2008 the BBFC has worked with VOD services to provide trusted age ratings for content available for download and streaming. Some of these platforms also provide control mechanisms which allow parents to make available to their children only content with an appropriate age rating for them. In 2019 the BBFC and Netflix jointly announced that Netflix will produce official BBFC age ratings for content using a manual tagging system and an automated rating algorithm, with the BBFC performing an auditing role to ensure accuracy. The aim is to have 100% coverage of BBFC age ratings on Netflix programming in the UK. These models for online regulation make a substantial contribution to child safety and consumer empowerment and have been welcomed by parents in particular.
28. Alongside the announcement of our partnership with Netflix, the BBFC and the Video Standards Council Rating Board (VSC) published a joint set of Best Practice Guidelines to help online platforms work towards greater and more consistent use of trusted age ratings online. This

includes recommending the use of consistent and more comprehensive use of BBFC age labelling symbols across all VOD services including additional ratings info and mapping parental controls to age ratings.

29. In the Committee's evidence session on 13 May, Caroline Dinenage MP noted that the Government is working with PEGI and the VSC on content descriptors for video games. As has been acknowledged by DCMS, such descriptors are equally important for video content, as similar arguments around potential harm to children apply both to games and video. We believe that the BBFC system of classification meets the key criteria for child safety online and the Government should continue to actively ask industry to implement consistent age ratings online for video content to guide families and protect children.

Regulation of content delivered by mobile networks

30. The BBFC is the independent regulator, on a voluntary, best-practice basis, of content delivered via the UK's four mobile networks (EE, O2, Three and Vodafone). Using the standards in our Classification Guidelines, content which would be age rated 18 or R18 is placed behind access controls and internet filters to restrict access to that content by those under 18 on all non-age verified devices on the UK's mobile networks. This content includes, for example, pornography and other adult sexual content, 'pro-ana' (anorexia nervosa) websites and content which promotes or glorifies discrimination or real life violence. Customers may only remove the network filters on mobile devices if they are able to prove that they are aged 18 or over.

4. Recommended additional measures

Labelling and rating user generated content

31. Our research also shows that 82% of parents and three quarters (73%) of children want to see trusted BBFC age ratings and ratings info displayed on user generated content (UGC) on video sharing platforms like YouTube, so they can avoid content that might upset or disturb them. 95% of parents said they want age ratings on video sharing platforms linked to parental filters.
32. Rating UGC presents a challenge for platforms and for traditional age rating mechanisms. The existing classification models for cinema, DVD and VOD do not scale to meet the volume of UGC available. There is also increasing pressure for more effective and comprehensive age labelling for UGC services which can in turn be linked to filters. In recognition of the fact that UGC is an increasingly significant source of content online, the BBFC is actively working on solutions that will enable clear and consistent age labelling on video sharing platforms. For example, we collaborated with the Dutch regulator, NICAM, to jointly develop YouRateIt (YouRI), originally at the request of the EU Commission's CEO Coalition to make the Internet a safer place for Children and it was trialled successfully in Italy.
33. The proof of concept YouRI tool allows uploaders to easily rate their content and viewers to both validate ratings and rate content simply and quickly with the help of an intelligent algorithm. YouRI provides clear traffic light ratings – green meaning suitable for younger children, amber meaning suitable for older children and teenagers, and red for adults only – that help audiences choose the right content for them and helps keep children safer online.

34. Following our work on this project, the BBFC is very confident that through a combination of uploader self-labelling and large scale crowdsourced feedback it is possible to generate effective content labelling (including full BBFC ratings, which parents and young people recognise from the cinema, physical media and VOD platforms) on video sharing platforms without disrupting the user journey.
35. It would make a significant difference to children's online safety if platforms such as YouTube had trusted BBFC signposts, created by those uploading or watching the video, linked to parental filters.
36. The BBFC is ready and eager to work with platforms to co-develop such tools and processes to fit their needs and the needs of their users, and to see them implemented. Lockdown has demonstrated just how integrated the online world is in our lives and the need to work together to protect children online by giving them the information they need to choose content well.

Age-verification

37. In 2016, the Government calculated that 1.4 million children in the UK see pornography every month. With Pornhub reporting a significant increase in UK traffic since lockdown began⁷, it is inevitable that children's exposure to such content will likewise have risen.
38. The BBFC was designated as the Age-verification Regulator under Part 3 of the Digital Economy Act (DEA), recognising our expertise in classifying pornographic material and online regulation. In October 2019, the Government announced that they would not introduce age-verification under the DEA, and instead the child protection goals of the legislation would be met as part of the broader online harms strategy. The BBFC supports the Government's proposals under "Children accessing inappropriate content: Fulfilling the duty of care", page 76 of the Online Harms White Paper. In particular, we would support the use of age-verification which is referenced as a potential mechanism.
39. There are several viable age-verification solutions ready to be deployed in the UK, including innovative methods that are light-touch while being necessarily robust. These solutions do not require that personal data be shared with pornographic services in the process of verifying age.
40. As part of its role as the Age-verification Regulator, the BBFC carried out research into children's exposure to online pornography. The research included an online survey of 1,142 parents and their children (aged 11-17). This revealed broad public support for the introduction of age-verification for commercial pornographic sites, with 83% of parents and 56% of children aged 11-13 in favour of such measures.
41. The research also included 36 qualitative interviews with 16-18 year olds and four focus groups of parents, each with six participants. Most children and parents interviewed believed that age-verification would prevent children from accidentally seeing pornography at a young age, and this in turn would delay the age at which children start to actively watch pornography. Some young people interviewed reported having seen pornography as young as 7 or 8 years old. Most

⁷ <https://www.pornhub.com/insights/united-kingdom-coronavirus>

of these children stumbled across pornography unintentionally at first, and it was often these children who felt they had been most negatively affected by pornography. They described feeling “grossed out” and “confused” when they first saw pornography, particularly those who had seen it when they were under the age of 10. Many had unintentionally stumbled across “aggressive” or “violent” pornography, which they found upsetting or disturbing.

42. Age-verification is an effective way to prevent children stumbling across pornographic content on commercial sites. The introduction of age-verification would help the Government achieve its objective to ensure the same protections are in place online as offline.
43. Furthermore, age-verification plainly has wider applications online beyond commercial pornographic services, with scope for developments that would allow children to securely share age-attributes (to prove they are over 13 when registering for social media accounts, for example) should this be required.
44. In the absence of age-verification for now, particularly in lockdown, the BBFC would again encourage parents to have frank and honest conversations with their children about the types of content they might see online, including pornographic content. In our qualitative research, very few young people reported having spoken about pornography with their parents. This contrasted with 60% of parents in the online survey who claim to have spoken to their children about online pornography at least once or twice.

5. Conclusion

45. The BBFC supports regulatory initiatives to make the internet a safer place and particularly the focus on protecting children from potentially harmful material online, in lockdown and beyond. It is our experience, and supported by research, that parents and other caregivers expect and prefer protections offline to be replicated online. Our research and outreach has also demonstrated that children themselves want protections in place online from inappropriate content.
46. Above all, in this time of increased unsupervised online access, the BBFC would encourage parents to talk to their children about content they may encounter on the internet and how to avoid material that might upset and disturb them, using age appropriateness as a guide to help them choose content well. Our resources online are there to help and are both educational and fun to use as a family during lockdown. We support a cross-departmental approach involving the Home Office, DCMS and the Department for Education to ensure that parents and children have the resources they need to protect themselves online and involvement of regulators such as the BBFC and charities to ensure that schools and parents have easy access to information and support.
47. Both in normal times and in lockdown, the BBFC believes children and the vulnerable are best served by trusted systems for age labelling of content which reflect national sensitivities and can be linked to filters and parental controls. The BBFC is also working with Government and industry to ensure consistency of age labelling regardless of the platform via which content is delivered.
48. Looking to the future, the BBFC believes that through a combination of uploader self-labelling

and large scale crowdsourced feedback it is possible to generate effective and reliable labelling for user generated content, and is ready and willing to work with video sharing platforms to develop this concept further. In addition, we support the introduction of mandatory age-verification to protect children from pornographic content online, which can have a devastating impact on their development and relationships in the long term. There are a number of robust solutions already available in the UK which do not require any personal data be shared with pornographic services.

49. We would be available to give further evidence and answer any questions raised by our submission.

May 2020