Department
for Culture
Media & Sport

Child Safety Online:

Age Verification for Pornography

Consultation response

July 2016

Contents:

1. Executive Summary

<u>The manifesto commitment</u>:

'We will stop children's exposure to harmful sexualised content online, by requiring age verification for access to all sites containing pornographic material'

As was set out in our consultation, the Government's preferred approach to delivering this commitment is to establish a new law, requiring age verification (AV) controls for online pornography - this was the manifesto commitment, and following consideration of the consultation responses, remains the Government's intention.

To underpin this, we will also establish a new regulatory framework, and we will ensure a proportionate approach by enabling the regulator to act in a sufficiently flexible and targeted way.

Following analysis of the responses to the consultation, Government will now take several next steps. We will:

1. **Bring forward legislation, in the Digital Economy Bill, to establish a new law requiring age verification for commercial pornographic websites and applications containing still and moving images, and a new regulatory framework to underpin it**
2. **Continue to work with payments firms and ancillary companies to ensure that the business models and profits of companies that do not comply with the new regulations can be undermined**
3. **Maintain ongoing engagement with pornography providers, age verification providers, and other parts of the industry, to ensure that the regulatory framework is targeted and proportionate, to achieve maximum impact and to enable compliance**
4. **Continue to work on broader internet safety issues, including work led by the UK Council for Child Internet Safety (UKCCIS), and raising awareness and resilience**

Further detail on these next steps is set out on page 9.

It is clear from our analysis of the consultation responses that this is an issue which tends to polarise opinion, with strongly held views on either side. Overall, there was a roughly even split between those supporting age verification (44%) and those not in favour (48%). Responses from individuals made up the vast majority of those which were submitted via our online questionnaire (94%). Over half of the individuals were men, the majority of whom were between 18 and 34 years old.

Crucially, however, many of the key organisations we work with in the online child protection sphere - children's charities, support and advice groups, the BBFC, internet service providers, and payment service firms and credit card companies - indicated their support for the proposals, and the overriding policy goal of protecting children online.

Over a quarter (26%) of the individuals who responded indicated that they are parents or carers, and 23% of individuals said that they work with children (in the education and health sectors, working in or with churches, in voluntary roles, mentoring, and as researchers). In both groups, a majority supported the Government's approach.

Notably, pornography providers who responded to the consultation also stated their support for the protection of children online, and (with caveats) the introduction of age verification controls to protect children from content which is not appropriate for them.

Arguments were made over the difficulties of enforcement, particularly taking action against non-UK companies. Others raised the potential for determined porn users - young or old - to circumnavigate any controls put in place. Other respondents cited freedom of speech arguments over denying or restricting access to pornographic content which would be legal for adults to view. Several individual respondents also raised concerns over any intervention by Government.

We are quite clear, however, that doing nothing in this area is not an option we are prepared to consider. Our children are leading increasingly connected lives, and using the internet as their primary source of entertainment and information, and it is a vital part of their social lives. Ofcom's 2015 Children and Parents: Media Use and Attitudes Report[1] found that the amount of time 8-11s and 12-15s spend online has more than doubled since 2005, with 12-15s now spending more time online than watching TV (see figure 1).

[1] http://stakeholders.ofcom.org.uk/binaries/research/media-literacy/children-parents-nov-15/childrens_parents_nov2015.pdf

Figure 1 - Estimated weekly hours of media consumption, at home or elsewhere among users, 8-11s and 12-15s: 2005 and 2015

Source: Ofcom

It is therefore absolutely right that we should continue to consider whether their experiences online are positive, and if not, what steps we should all be taking to better protect them - as Government, parents, internet companies, individuals and charities. We all have a responsibility to protect children from potential harms and we must all play an active part.

There is clearly an important difference between children - particularly younger children - inadvertently stumbling across pornographic content online, and young people who deliberately seek it out. We recognise that protections put in place are likely to be challenged by the more technically able and determined users of online pornographic content.

But this should never be seen as a reason to do nothing, nor to simply accept the status quo. We can acknowledge that implementation of an ambitious policy will present technical difficulties, at the same time as reasserting our determination to improve the existing protections for children online. And we should not allow that determination to be distracted by spurious and misleading arguments over freedom of speech or censorship.

In the physical world we expect those profiting from the sale of adult products and adult content - not just pornography, but also knives, alcohol, solvents, tobacco, and so forth - to sell their products responsibly using appropriate age checks. That is why the key focus of the Government's policy here is on the commercial providers of online pornographic content. These companies provide content to UK users with little or no protections to ensure that those accessing it are of an appropriate age. We would not accept this situation in the physical world - for example, we would not

expect or accept the sale of age inappropriate products such as knives, tobacco or alcohol to children.

Our manifesto commitment was clear, in that we should take similar precautions in the online world to protect children from content and services that are not suitable for them. We have been given no compelling reason why these precautions should be relaxed in the online world. Indeed, it is arguably even more important that effective precautions should be in place for online activity, as it is potentially less visible to parents and carers. The responses to the consultation we have received from many experts in the field of child online safety have indicated strong support here - for taking action, for not accepting the status quo, and also for focusing on the companies which profit from the provision of this content, setting an expectation that they can, and should, act in ways that exhibit corporate and social responsibility.

As we have said all along, this is not about censuring consenting adults for viewing content that is legal. We have responsibilities towards our children and young people, to ensure that they grow up with a well-rounded sense of sex and relationships, and not one that is solely or mainly seen through the lens of pornography. As parents, carers, technology industries, and content creators we should always be asking ourselves what sort of world we are creating for the next generation of internet users. Crucially, making changes can be difficult for us all, especially in the fast-moving, highly innovative and open world of the internet - but we write off the potential for things to be better at our collective peril.

Several respondents - individuals, charities, and pornography providers themselves - suggested that blocking at Internet Service Provider (ISP) level should be part of the enforcement process, arguing that this would act as a strong lever over foreign providers to comply, and also to increase protection for children from non-age-verified sites. However, the Government's clear position is that blocking of infringing sites would be disproportionate, and would not be consistent with how other harmful and/or illegal content is dealt with. For example, the existing processes whereby online terrorist material, and images of child sexual abuse are blocked are not underpinned by statutory requirements. Yet in respect of both the UK has robust, highly effective systems in place, to ensure that swift and decisive action can be (and is) taken to prevent this harmful content being accessed. In the latter case, for example, child sex abuse material is dealt with by a multi-stakeholder, voluntary approach underpinned by the Internet Watch Foundation (IWF), which provides a 'notice and takedown' service to advise ISPs, in partnership with the police, to remove this criminal content.

We are also keenly aware that age verification is not a panacea, and should certainly not be seen as the limit of child online protection activity in which the Government and key stakeholders are involved. We will continue to build on the encouraging

progress made on a voluntary basis by ISPs and mobile network operators, particularly the family friendly filters provided for free by the major ISPs, which cover the vast majority of homes across the UK. Additionally, we will be delivering an awareness-raising campaign about the risks to young people of exposure to harmful content online. The UK Council for Child Internet Safety (UKCCIS) will continue to draw together expertise and share best practice from multiple stakeholders in the internet safety arena. Shortly before Christmas 2015, UKCCIS published two social media guides - one for social media providers, and one for parents and guardians - to increase awareness and safety in social media, the use of which is a central component of many children's online experiences. We will also continue to ensure the membership of the Council is able to draw on the very best expertise from across the sector to support its vital work.

We will continue the dialogue with stakeholders from the pornography industry, and encourage them to remain engaged in designing a regulatory system which protects freedom of expression, while protecting children from content that is not appropriate for them. It is particularly encouraging that the adult entertainment industry has engaged positively and constructively with the consultation, and in particular we are keen to explore with these companies in further detail the idea of identifying 'AV ready' sites prior to the law coming into force, and the scope for the industry to have its own ongoing self-regulatory role to ensure optimal child protection online.

Another important theme raised in consultation responses centred on the varied ways in which people, particularly children and young people, are accessing content online. As well as websites, mobile applications ('apps') - rather than websites - are increasingly an important, if not central part of people's online activity. For this reason, and due to these views having been raised through the consultation process, we do not want to draw the focus too narrowly.

We want to guarantee that the law, and the framework which underpins it, are neutral in respect of the ways in which this content is accessed online, and also to ensure that apps which are specifically aimed at the provision of pornographic content to users are firmly within scope of the new legislation. It is clearly important that such emerging trends, and those which we have not even yet foreseen, can be incorporated within the system to provide the best protection for children.

The immediate next stage is for the Government to introduce a new law, in the Digital Economy Bill, delivering on the manifesto commitment, and informed by our consultation. This is the start of the process, and we will continue to work with the many stakeholders in this area to ensure we keep pace with this fast-moving environment, and to ensure that the effectiveness and proportionality of the respective stages of regulation are kept under review. We will move immediately to introduce the processes to identify and notify non-compliant sites, and also to enable

payment providers to require compliance from sites which use their services. We will then consider the appropriate timings and process to introduce civil sanctions in respect of those providers which remain non-compliant. Above all, we must deliver a robust, effective system to maximise the protections available to children, and to make their online experiences as enjoyable and as safe as they deserve.

2. Next steps

We will:

1. **Bring forward legislation, in the Digital Economy Bill, to establish a new law requiring age verification for commercial pornographic websites and applications containing still and moving images, and a new regulatory framework to underpin it**
2. **Continue to work with payments firms and ancillary companies to ensure that the business models and profits of companies that do not comply with the new regulations can be undermined**
3. **Maintain ongoing engagement with pornography providers, age verification providers, and other parts of the industry, to ensure that the regulatory framework is targeted and proportionate, to achieve maximum impact and to enable compliance**
4. **Continue to work on broader internet safety issues, including work led by UKCCIS, and raising awareness and resilience**

2.1 Bring forward legislation, in the Digital Economy Bill, to establish a new law requiring age verification for commercial pornographic websites and applications containing still and moving images, and a new regulatory framework to underpin it

The Government has introduced new legislation, in the Digital Economy Bill, on 5 July 2016. Though the subsequent timings of the Bill's passage through Parliament cannot be specifically set out at this stage, it is anticipated that by the spring of 2017 the Bill should have received Royal Assent.

To implement the policy aims of the new law (requiring age verification for pornographic sites and applications), the legislation will also introduce a power for Ministers to appoint a 'person or persons', i.e. a regulator or regulators, with responsibility in this area.

Government will work with the regulator(s), the pornography industry, and payments providers in the period before the law comes into force, to ensure all parts of the industry are fully engaged, and are aware of and able to comply with the required standards for age verification controls, and the potential enforcement mechanisms for those sites which remain non-compliant.

Government's intention is to establish a new regulatory framework, and to introduce new regulatory powers, in order to:

- Ensure the regulator, or co-regulator, is able to work effectively with stakeholders to ensure that commercial pornographic sites providing still and moving pornographic images to consumers in the UK without robust age verification systems in place become compliant;
- Give the regulator discretion to set and monitor standards for age verification controls. As was clearly stated in the consultation, the Government's position is that a simple 'tick-box' which requires users to confirm they are over 18, or even just to enter a date of birth, does not constitute a satisfactory solution. Given the rate at which innovative AV solutions are coming to market, we want to ensure that the regulator is enabled to make a determination as to the sufficiency of different and new controls;
- Introduce immediately the processes for the regulator to identify and notify infringing sites, and to enable payments providers to withdraw services from those which do not comply. We will then consider the appropriate timing for introducing civil sanctions for non-compliant providers;
- Ensure that the regulator could issue civil sanctions, because we think this would be effective and proportionate, enabling the regulator to maintain a flexible approach to content standards (and also because we consider that conversely, criminal sanctions would not be proportionate, given the flexibility afforded by a civil regime);
- Monitor compliance with the new law by commercial pornography providers;
- Identify sites which are in breach and notify them (and/or their parent company) of this, giving them a period of time within which to become compliant. Where required, we want the regulator to have the power to set appropriate fines for persistent non-compliance when other routes have proved unsuccessful;
- Ensure the enforcement regime is sufficiently flexible to adopt other approaches to ensure that commercial providers of online pornography comply with the law;
- Enable those that support the business models of pornographic content providers (such as payments and advertisers) to withdraw services from commercial providers in breach of the law, through notifying them of non-compliant sites. The introduction of a new law, and of new regulatory powers to monitor and identify sites, will enable payments companies to deploy existing compliance processes with minimal impact on their operations. As the payments firms already require as part of their terms and conditions that merchants must be acting legally both in the country they are

based in, and also in the countries which they serve, we think this will be an effective sanction;

- Ensure a targeted and prioritised regulatory approach to monitoring and enforcement, to achieve maximum impact. The Government's preference is for the regulator to have discretion as to which sites and providers it takes enforcement action against. For example, the regulator should be able to focus on the most popular sites, those known to be most frequently accessed by children and young people, or the size or profitability of the provider;
- Include businesses with fewer than 50 employees, as it is not uncommon for internet companies to have small workforces, and we want to ensure that such businesses could be in scope.

2.1.1 - Applications (Apps)

An important recurring theme from responses to the consultation was that the routes by which children can access pornography online are not limited to websites, and in particular that applications (apps) are an increasingly popular way for this content to be provided. It is therefore important that we ensure that we build in the requisite flexibility, and that applications are within scope of the new law. This is particularly the case where commercial pornography providers are looking to innovate and provide such content in new ways - it would not be consistent with the overriding policy goal of protecting children to allow any potential loophole around applications.

Crucially, as is outlined above, it is firmly not Government's intention to prevent or restrict adults from accessing content which is legal for them to view. The policy goal is to maximise the protections available for children online by ensuring that pornographic content which is not suitable for them to see (and which we would determine as such in the offline world) is placed behind access controls.

2.1.2 - The Regulator

At this stage, the Government is not seeking to identify the regulator(s). We are also currently considering the preferred approach to how the regulator should be funded. Our starting point, however, is that the regulator should not be funded by any levy on UK businesses, but that amongst its potential enforcement powers against infringing sites, the regulator would be able to issue proportionate fines (depending for example on the period of non-compliance, and therefore potential harms, and size of the provider's commercial activities).

As we have set out above, it is also crucial that the regulator is enabled and empowered to consider emerging trends - such as the increased use of applications - to keep pace with changing technology and activity online, and to ensure the optimal delivery of the goal of child protection online.

2.2 Continue to work with payment firms and ancillary companies to ensure that the business models and profits of companies that do not comply with the new regulations can be undermined

The Government will work with payment service firms (e.g. debit and credit card schemes, banks, and other providers of online payment systems) to ensure that commercial sites and applications providing pornographic content to consumers in the UK without robust age verification systems in place become compliant.

Should the merchant operating the website not become compliant, major payment service firms such as Visa and Mastercard would be able to withdraw payment services from the site under their existing terms and conditions, which already require merchants to comply with national laws. For this reason, we would not expect these measures to create significant additional costs for payment service firms, as they would be able to use existing processes in place to initiate the withdrawal of payment services from non-compliant merchants.

Furthermore, for this reason we do not think it would be appropriate or necessary to place a specific legal requirement on these payments companies to remove services. As has been set out in our impact assessment, discussion with these companies has revealed that the use of existing processes should ensure that new costs to these payments firms would be minimal, and as their terms and conditions already require merchants to be legally compliant, a new obligation on payments companies would not be necessary or proportionate.

Companies involved in ancillary or support services that underpin the profits of online pornography will also be enabled to withdraw their services from websites that are in breach of the law, through notification from the regulator of merchants which are in breach of the law.

This is likely principally to affect payments services who require in their existing terms and conditions that businesses using their services comply with national laws, as well as advertisers, web hosting services and others. Payments services include (but are not limited to) credit cards, and digital payments such as Paypal.

It will also be important to enable the regulator to work with existing and emerging payments firms to ensure that the policy aims - here, ensuring that the cashflows of pay sites consistently in breach of the new law can be disrupted - are delivered. Again it will be important to remain technology-neutral, given the speed with which new payments systems are being developed.

For this reason, we intend to maintain sufficient flexibility should emerging payment systems or providers come to the fore in respect of online pornography, such that it

would be appropriate and proportionate for the regulator to monitor and work with these organisations.

2.3 Maintain ongoing engagement with pornography providers, age verification providers, and other parts of the industry, to ensure that the regulatory framework is targeted and proportionate, to achieve maximum impact and to enable compliance

We are clear that the introduction of new legislation is the beginning of the process, and of the series of important conversations we need to maintain with all aspects of the industry. It is incumbent on all of us to ensure we do not lose sight of the overarching goal: ensuring that the internet is as safe and enjoyable for children and young people as possible.

To design an effective, targeted regulatory regime, we will continue the dialogue with those involved, and those who have the most interest in making sure it works. The pornography providers have told us that they do not want children on their sites, accessing their content. We must look to these providers to work towards innovative, simple solutions to verify the age of people visiting their sites.

Prior to the new laws coming into force, it will be essential for the regulator, the Government, and the industry to maintain an ongoing dialogue: on the detail of the law itself, on how regulation and enforcement will operate, and to guarantee best practice from all sides. As set out above, we are particularly keen to explore further the idea of 'AV ready' providers, and other potential industry-led approaches, with them.

We all have a stake in ensuring this policy works - on the one hand, no-one wants to stop consenting adults from accessing legal content, nor to censure them for doing so. We do not want to penalise any business that provides this content in a responsible and legal way, that ensures children are not easily able to access it.

On the other hand, we should not simply accept that nothing can be done to prevent children seeing content which is unsuitable, or to make it far less straightforward than it is now. There is no plausible moral or freedom of speech argument that can be made to say that pornography is appropriate for children - and especially younger, more vulnerable children - to see.

In the consultation, we also asked whether UK-based small and micro-sized businesses (those with fewer than 50 employees) should be exempted from the scope of the policy. Whilst responses overall were relatively evenly split, several agreed with our starting position that these businesses should not be exempt, particularly as the workforces of online companies will often be well under 50 people. Given the importance of the overriding child protection aims, therefore, it remains our

view that it would not be appropriate to exempt small and micro-sized companies from the scope of the legislation.

2.4 Continue to work on broader internet safety issues, including work led by UKCCIS, and raising awareness and resilience

This Government will keep the safety of our children online at the top of the agenda, and we will continue to work with all of those with expertise and personal vested interest in doing likewise - charities, schools, parents, platforms, internet service providers and mobile networks, content providers, and technology providers - to do so. We have said before - and more importantly, it has been said to us - that the UK leads the world in respect of Internet safety. Huge strides have been made, largely through voluntary, industry-led activity. The introduction by ISPs of family friendly filters in the UK, the continued and increasing efficacy of the work led by the Internet Watch Foundation[2] and the collaborative working embodied by UKCCIS all demonstrate why the UK deserves such a reputation.

As stated above, however, we must always be prepared to reflect on how things could be improved, and what more can be achieved through collaborative activity, by listening to the voices of those who have the deepest concerns about online safety. A recurring theme in many responses - both of those in favour of age verification, and also those not in favour - was of the need for broader work to be done to help educate our children and young people. This needs to take the form of multiple strands of work - especially, raising awareness for parents of the many protections already available, and what they can do to engage their children in conversation about the things they see and do online that may concern them. There are myriad resources available - many through the membership of UKCCIS and partners - which can help parents begin these conversations, and also provide direct support and guidance for children themselves.

The Government has also committed to a wide ranging campaign to increase awareness of online safety issues, and to build children's resilience to potential online harms. Clearly, these extend far beyond online pornography - for example, to bullying, sexting, and other potential online harms such as pro-anorexia and suicide sites. Again, this was a point many respondents made to us through the consultation, and one on which we are committed to taking action.

[2] In April 2016, the IWF reported a 417% increase in online confirmed reports of illegal images or video over two years: https://www.iwf.org.uk/about-iwf/news/post/444-iwf-announce-record-reports-of-child-sexual-abuse-online

3. Summary of consultation responses

3.1 - Overview

On 16 February 2016, the Government published a consultation, setting out a preferred approach to delivering its manifesto commitment on age verification, and inviting views[3]. The consultation ran for 8 weeks, until 12 April, and received a total of **3,764**[4] responses. **3,454** responses were recorded on the online survey platform, **306** submitted via e-mail and **4** responses through the postal system.

The consultation document set out the Government's preferred approach to delivering on the above manifesto commitment, namely:

1. To establish a new requirement in law for commercial providers to have in place robust age verification controls for online pornographic content in the UK; and
2. To legislate to establish a new regulatory framework, underpinned by civil sanctions.

We set out 16 questions in the consultation, which are included at **Annex B**. A comprehensive summary of the answers is also set out below**.** When we published our consultation in February, we mentioned work which the Government commissioned from Brook/Youthnet[5] to gather views from young people on the themes and proposals in the consultation. The results of this work will be published separately.

3.2 Who responded?

Of the responses to the online consultation, the overwhelming majority (94%) came from individuals. Organisations made up 3% of the responses, and the remaining 3% did not declare whether they were responding as individuals or on behalf of an organisation.

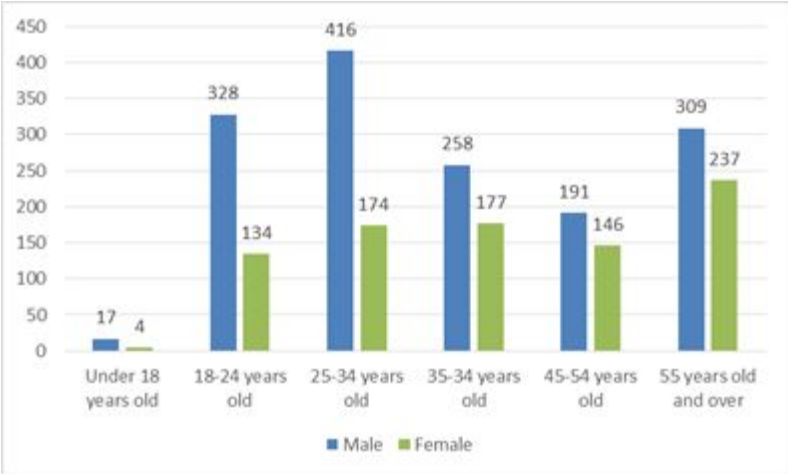
More than half (57%) of the individuals responding were male, a third (33%) were female, and 10% did not indicate their gender. From those who did indicate their age and gender, most of the male respondents were younger (with the greatest proportion being aged 25-34), while the greatest proportion of female respondents were aged over 55 (see figure 2 below).

[3] The consultation document is available here: https://www.gov.uk/government/consultations/child-safety-online-age-verification-for-pornography

[4] Of the 3764 responses submitted, 577 were blank responses

[5] Youthnet has since merged with "The Connected" to form "The Mix"

Figure 2 - Age and gender of respondents



3.3 How did people respond?

It is clear that online pornography is an issue which tends to polarise opinion, with strongly held views on either side. As our analysis of the responses demonstrates, views tend to be strongly held on both sides of the debate.

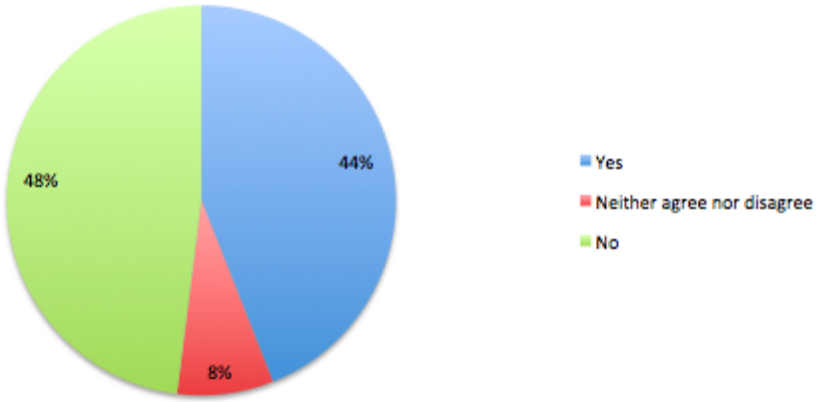
Questions 1-3 - Overall views on Age Verification

Many of the key organisations that Government works with in respect of online child protection - children's charities, support and advice groups, the BBFC, internet service providers, and payment service firms and credit card companies - indicated their support for the proposals, and the overriding policy goal of protecting children online.

Overall, the responses demonstrated a roughly even split between those supporting the proposals, and those not supporting them.

Question 1: 44% of those who responded thought that AV controls should be placed on pornography online that would receive a British Board of Film Classification (BBFC) rating of 18 or R18. **48%** did not think AV should be in place, and **8%** did not know (see Figure 3).

Figure 3 - In your opinion, should age verification controls be placed on all forms of legal pornography ('sex works') online that would receive a British Board of Film Classification (BBFC) rating of 18 or R18?



Question 2: Asked whether controls should be applied to sites containing still and moving images of pornography, **39%** of those who responded to this question agreed, compared to **46%** who thought that AV should not be applied to either. A very small number (**1%**) thought AV should apply to moving images only.

Question 3: 43% of respondents agreed with the introduction of a new law to require AV for online pornographic content in the UK, with many of these indicating strong agreement (**31%**). **44%** disagreed with the introduction of such a law, **35%** of whom strongly disagreed; and **8%** neither agreed nor disagreed.

Over a quarter (26%) of the individuals who responded were parents or carers, and 23% of individuals said that they work with children (in the education and health sectors, working in or with churches, in voluntary roles, mentoring, and as researchers). In both groups, the majority supported the Government's approach: 53% of parents/carers, and 65% of those who work with children.

Our position therefore is that we will pursue the preferred approach, as set out above. The new law, and the framework, will capture still and moving images, and will be sufficiently flexible to incorporate pornographic applications.

Question 4 - Age Verification Controls

Question 4: This question covered AV controls themselves, and whether these should be consistent with the existing standards set by Ofcom, i.e. confirmation of credit card ownership (with which **28%** of responses agreed), reputable digital identity management service (**26%** agreed), or other comparable proof of account ownership that effectively verify age (**19%** agreed). Other suggestions submitted in

responses included use of a driving licence or other commonly available document (**1%**), or a tick box/self certification (**3%**).

The Government's position is that discretion should be given to the regulator in respect of the suitability of AV controls. As was clearly stated in the consultation, our view is that a simple 'tick-box' which requires users to confirm they are over 18, or even just to enter a date of birth, does not constitute a satisfactory solution. Given the rate at which innovative AV solutions are coming to market, we want to ensure that the regulator is enabled to make a determination as to the sufficiency of different and new controls. Within this, it is clearly possible that there will be more than one potential AV solution which will be satisfactorily robust.

Question 5 - Power to direct payment firms

Question 5: Asked whether a regulator should have the power to direct payment and other ancillary providers to remove their services from non-compliant websites, **35%** agreed, and **43%** disagreed. **16%** did not answer, and **6%** did not know**.**

Our position is that the new framework would enable those that support the business models of pornographic content providers (such as payments firms and advertisers) to withdraw services from commercial providers in breach of the law, through notifying them of non-compliant sites. Given that the payments firms already require as part of their terms and conditions that merchants must be acting legally both in the country they are based in, and also in the countries which they serve, we think this will be an effective sanction. The introduction of a new law, and of new regulatory powers to monitor and identify sites, will enable payments companies to deploy existing compliance processes with minimal impact on their operations.

Questions 6-13 - The Regulatory Framework

Question 6: 21% of respondents made suggestions for other actions that could be taken to ensure commercial providers of pornography comply with the new law. These included shutting down or blocking sites (**16%**), licensing sites to operate legally (**7%**), and applying financial or custodial deterrents (**27%**).

Question 7: 37% of responses indicated agreement that the regulator should have the power to direct parent and umbrella companies to comply, and **42%** did not agree.

Question 8: 25% of those who responded agreed with the introduction of a civil regime, compared to **49%** who did not**.** Of those who did agree, the most common

reason given was that this would be effective, and/or more flexible than a criminal regime.

Question 9: 16% of respondents thought that a criminal offence would be a better form of regulation, whereas **80%** did not.

Question 10: 43% of respondents agreed with the introduction of a new regulatory framework, **38%** of whom strongly agreed. (**54%** disagreed, **46%** strongly)

Question 11: We asked about the powers a regulator (or regulators) should have, and set out options. Of those who answered this question, there was strong support for:

- Monitoring compliance by sites (**92%**)
- Issuing fines to non-compliant sites (**89%**)
- Notifying those responsible for sites they are in breach of the law (**89%**)
- Directing payment providers to withdraw services (**86%**)
- Notifying payment providers of infringing sites (**86%**)
- Directing those responsible for sites to comply within a specified time (**86%)**
- Setting standards for AV controls, and determining content which is in scope (**86%**)

We therefore want to ensure that the regulator can issue civil sanctions, because this would be effective and proportionate, enabling the regulator to maintain a flexible approach to content standards (and also because we consider that conversely, criminal sanctions would not be proportionate, nor sufficiently flexible).

The regulator will monitor compliance with the new law by commercial pornography providers. It will identify sites which are in breach and notify them (and/or their parent company) of this, giving them a period of time within which to become compliant. Further, where required, we want the regulator to have the power to set appropriate fines for persistent non-compliance when other routes have proved unsuccessful.

Question 12: 24% of respondents thought that a co-regulatory approach would be appropriate in this context, compared to **37%** who did not. **18%** said they did not know, and **21%** gave no reply.

Question 13: When asked whether the regulator's approach should focus on having the greatest proportional impact (for example by looking at the most popular sites, or those most visited by children in the UK), **35%** agreed, whereas **34%** did not. 21% gave no answer, and **10%** did not know.

We want to ensure a targeted and prioritised regulatory approach to monitoring and enforcement, to achieve maximum impact. The Government's preference is for the regulator to have discretion as to which sites and providers it takes enforcement action against. For example, the regulator should be able to focus on the most popular sites, those known to be most frequently accessed by children and young people, or the size or profitability of the provider. Given the responses received which mention applications and other routes to accessing online pornography, we want to ensure the enforcement regime is sufficiently flexible to adopt other approaches (i.e. not focus too narrowly on solely websites) to ensure that commercial providers of online pornography comply with the law.

Question 14 - Small and micro-sized businesses

Question 14: there was a relatively even split between those who thought that small and micro sized businesses, i.e. those with fewer than 50 employees, should be exempt from the scope of the policy (**31%**), and those who did not (**38%**).

Our starting position was that businesses with fewer than 50 employees should not be exempt, considering that the workforces of online companies will often be well under 50 people. Given the importance of the overriding child protection aims, therefore, it remains our view that small and micro-sized companies should not be exempt from the scope of the legislation.

Questions 15-16 - Support for proposals, and effectiveness

Question 15: 35% of respondents indicated being broadly in favour of the proposals set out in the consultation, **42%** stated they were against the proposals and **23%** neither agreed nor disagreed.

Question 16: when asked how effective the Government's preferred approach would be in preventing children from accessing online pornography, **11%** thought this would be very or extremely effective, **24%** thought it would be moderately/slightly effective, and **41%** thought it would not be effective at all. **4%** did not know, and **21%** gave no answer.

Given the strong support from key stakeholders, and our clear manifesto commitment to take action, Government will take forward the proposed approach and continue to engage with all involved to deliver an effective, proportionate framework. As set out above, it is particularly important to recognise that the most technically savvy young people are likely to seek to circumnavigate controls, but at the same time, that we all have responsibilities to ensure that it should be far harder

for children who do not wish to see this content to stumble across it inadvertently. Further, age verification controls are part, but not all, of the approach to protecting children from potentially harmful content online. Education, awareness raising with parents and carers, and equipping children with the resilience and tools to deal with their online experiences are critical, and that is why Government has committed to further work to ensure that the wider package of online protection is robust and effective.

4 - Key stakeholder responses

In this section we provide a summary of responses from key groups of stakeholders. Where anonymity has not been specifically requested, we directly quote from organisations who have responded.

4.1 - Charities and support/advice groups

Amongst the charities which responded to the consultation, there was wide-ranging support for the Government's overriding policy aim - the protection of children online. **Childnet**, a child online safety charity, said that the proposed regulatory framework, "...which would place pressure on non-compliant websites through payment providers and other auxiliary services...would be an effective approach in reducing the number of pornography sites that do not have suitable age verification in place", and that they "...very much welcome any move to encourage the global pornography industry to act in socially responsible ways." **Get Safe Online**, an online security advice service, recommended that a holistic approach, including education, raising awareness and addressing behavioural issues, was important to delivering the policy aims[6]. This was a view shared by several respondents.

The Children's Charities Coalition on Internet Safety (CHIS) said in their response: "Whilst it is true that most of the commercial pornography publishers acknowledge their sites are not meant for minors and say minors are not welcome on them, in practice they have done little or nothing to inhibit access by minors and it seems clear to us that they won't unless and until they are compelled to do so by law or are otherwise highly incentivised. The Government's approach effectively does both."

The NSPCC strongly agreed with the introduction of a new law to require age verification for online pornography, and want to ensure that protecting children is the primary concern. They submitted two responses: first, a report of session they had undertaken with fifteen 15-17 year olds across the UK to discuss the proposals. Respondents highlighted concerns over pop-up images and the need for better/more sex education, issues around young people being able to circumnavigate any controls, and also the issues around adult content being available on social media and other platforms and applications. The NSPCC's organisational response set out their concerns that the difference between a civil and criminal regime was not sufficiently clear, and advocated that ISP-level blocking of infringing sites should be part of the approach.

Brook, the UK's leading provider of sexual health and wellbeing services and advice for under-25s, held two workshops, and ran an online survey, on the issues raised in

[6] See page 13 for further detail on the work that Government, in partnership with other stakeholders, is taking forward in this area.

the consultation. Young people participating had a view of the internet that was significantly more positive than negative, and they did not view pornography itself as inherently neither 'bad' nor 'good'. However, respondents to an online survey showed that young people do have concerns over content such as 'revenge porn', and that restricting access to pornography for under 18s could lead to them seeking this content on the 'dark web'. The response states that "...young people concluded that a lack of information from parents and/or schools was leaving their peers vulnerable; they - and Brook - are in favour of respecting young people's agency by empowering them through education, which is in the end what will help them stay safe in the long term."

Mediawatch, a UK-based pressure group campaigning for family values in the media, was supportive of the Government's proposals and called for worldwide reach of regulations. Mediawatch believed that incorporating financial transaction providers was a novel idea, and added: "...none of the consultation proposals remotely approach what anyone could call censorship."

Barnardo's, a British children's charity, were broadly in favour of the Government's proposals, and believed that "Non-compliance with the new law should result in fines or the closure of the website."

Internet Matters are a UK-based, not-for-profit organisation whose objective is to help keep children safe online. Internet Matters supported the introduction of a civil regime, as well as all of the proposed regulatory powers, and believed that Ofcom and the BBFC should have a role in regulation.

Parent Zone are a UK-based organisation with the objective to "improve outcomes for children in a digital world". The organisation strongly supported age verification methods and the introduction of a civil regime, but believed that "the inconsistency between the offline and online supply of R18 content is problematic. It sends a mixed message to parents about the risks and harms associated with online and offline pornography. A criminal approach would send a clearer stronger message."

The Diana Award is an organisation that awards "courageous, caring, compassionate young people" aged 9-18. The organisation agreed with the Government's proposals and believed that a new regulatory framework should give a regulator all of the powers listed on question 25 of the online survey. The Diana Award believed that a co-regulatory approach would be suitable, with Ofcom, the BBFC, the Financial Conduct Authority, the Payments Services Regulator, Phonepayplus, the Advertising Standards Authority and the Police Intellectual Property Crime Unit (PIPCU) all having a role in regulation.

4.2 - The British Board of Film Classification (BBFC) and Ofcom

The BBFC response expressed support for the child protection aims, and agreed that such content risked harming children's emotional and psychological development. The response noted a number of voluntary arrangements in which the BBFC has a role (including video on demand platforms and mobile networks), and the BBFC's existing expertise in determining and categorising pornographic content.

Whilst the response raised some issues over scope of regulation, and effectiveness of enforcement (including the potential need for ISP blocking as a last resort for the regulator), the BBFC indicated willingness to play "a substantive role in ensuring effective age verification (AV) is in place to prevent children accessing pornography online."

Further, the BBFC asserted that applications ('apps') should be considered, adding: "...there is strong evidence to suggest that the popularity of adult apps will increase significantly over the next five years.' The response also pointed to the 'rapid demise' of desktop and laptop computers, and a subsequent shift from website-based to app-based pornographic content. The response indicated that '...such apps will increasingly be converted into 'stand alone' offerings, creating a significant loophole that would enable children to access pornographic content without being required to age verify."

Ofcom, the UK's communications regulator, fully supported the Government's child protection objectives. However, the response raised concerns specifically over identifying the publishers of services in breach (including providers of free/'tube' sites), and also the difficulties of civil enforcement against non-UK services.

Additionally, Ofcom agreed that proportionality 'can be a key element to an effective enforcement regime', but noted that enforcement against the largest or most popular sites may 'have limited effect on the availability of pornography to children in the longer term', as under-18s who were determined to access pornography would switch to alternative providers.

Ofcom also agreed that the UK is a leader in online child protection, particularly in "...the broad availability of parental controls on fixed and mobile internet access services. We strongly support the consultation's suggestion that improving the take-up of such tools will further child online safety."

4.3 - Payments companies and advertisers

Several major payments companies responded positively to the consultation.

Visa Europe said that "...the payments industry has already contributed constructively to discussions, and we have a well-established compliance programme that, we believe, sits well alongside the proposals in this consultation".

Mastercard agreed that legally requiring merchants (i.e. websites) to verify the age of consumers online could be "an effective tool in achieving the Government's objective of protecting children from accessing online pornography".

The UK Cards Association, the leading trade organisation for the UK cards industry, said in its response: "The card payments industry will do everything it can to support compliance of merchants within a new regulatory regime". They also added that "...there must be a statutory underpinning for this, supported by a robust regulator taking an active role in monitoring compliance."

4.4 - Law Enforcement

The National Police Chiefs Council – Child Protection Abuse Investigation Working Group welcome the moves by Government to restrict access to pornographic content by children and young people and apply appropriate age verification filters. They recognise the emerging evidence base relating to access/ exposure to pornography by children and potential implications of this on health, wellbeing and expectations. They fully understand the practicalities of establishing a robust age verification process which is able to deal with all eventualities but feel that the current situation is unacceptable and any steps they can introduce is a step forward.

4.5 - Pornography providers

Responses from pornography providers and others involved in the adult entertainment industry showed a mixed picture. Whilst there was broad support for the overarching aim of child protection, there were issues raised about implementation and enforcement steps.

Portland TV, a UK-based company, strongly agreed with the introduction of a new law requiring age verification, "...if this signals a move to establish a single framework for the regulation of all adult service providers, irrespective of content strength, delivery method, country of origin or establishment and/or whether payment is required." They highlighted the need for parity between UK-based providers and those based abroad, and although indicating agreement with the proposals set out in the consultation, Portland stressed that ISP blocking of infringing sites, as a last

resort for enforcement, was “a glaring omission”, without which “...the Government’s proposed approach will founder.”

MindGeek, the parent company of several major sites including PornHub, also supported a new law requiring age verification and a new (civil) regime, but with significant caveats. They agreed that ISP blocking of infringing sites would be a very important part of enforcement, as this “...will go a very long way to stopping non-compliant foreign sites” - especially those which do not accept payments or advertising.

The Digital Policy Alliance (DPA) Age Verification Working Group, chaired by the Earl of Errol, is not a porn industry group, but comprises membership from the adult entertainment sector, as well as age verification and payment companies, and providers of other age-restricted products and services such as tobacco, alcohol, dating and gambling services. Several members replied separately (including the two companies above), but the group also submitted a joint response. In it, they made similar points about ISP blocking being required (asserting that offending sites should be blocked “...at the ISP level as soon as they are identified”), and issues around overseas sites that offer free content.

The group agreed that blocking card payments was a “useful tool”, but also flagged a potential risk that this “...could serve to encourage the use of anonymous payment methods such as pre-paid cards and crypto-currencies.” In respect of how the regulator might take steps to identify and contact the companies providing infringing sites, the group offered some practical steps - particularly, saying that “...most big operators are known and messaging feeds from within the adult industry can be used to direct operators whose contact details cannot be readily identified via ‘Whois’ searches to the appointed regulator or enforcement agency.” The group suggested that “Conveying messages to most modern adult providers can generally be accomplished within 24 hours and the vast majority of minor players can also be reached in a similar timescale”.

An idea proposed by the group, and echoed in the response from **MindGeek**, was that of a register of ‘AV Ready’ sites, or an ‘Ethical Pornography Index’ - whereby early engagement between the regulator and porn providers would enable the latter to demonstrate they were ready to comply with AV requirements prior to the law coming into force.

Further, the group also supported the Government’s proposed focus on commercial providers: “The DPA...recommends that the onus for implementing AV should fall to the content industry rather than ISPs...The DPA has been assured by some of the biggest providers of adult material that as long as AV is effectively enforced, they will comply with the regulations and also help police any breaches by passing on to the regulator any instances of non-compliance of which they become aware.”

One respondent - “a creator of erotic media and worker in the adult industry who stands to be personally affected by these proposals” - raised numerous concerns. Alongside reservations over the evidence of harm to children from pornography, the respondent also drew out the findings of the expert panel report that mainstream media were more likely than pornography to be a source of sexualised content for young people. This response also highlighted the need for improved sex education in schools, and asserted that “Sex education based around pleasure and consent reduces violence and helps keep young people safe online”.

The British Fetish Film Festival response suggests that the: “...Government would be better served by working to reduce actual child sexual exploitation rather than focusing on pornography”. They suggest this could be achieved by enforcing legislation already in place that criminalises violence, abuse and exploitation, and by promoting compulsory sexual education in schools. To note, the Government has taken action to support education through schools, for instance through Personal, Social, Health and Economic (PSHE) guidance and the inclusion of Internet Safety in the curriculum.

Xbiz is an American publisher of business news of the sex industry. Xbiz stated that they “neither agree nor disagree” with the introduction of a new law to require age verification for online pornographic content in the UK. Xbiz did not think that a regulator should have the power to direct payment and other ancillary services to remove their services from non-compliant websites. However, Xbiz thought that the regulator should have the power to direct parent and umbrella companies to comply. In addition, Xbiz disagreed with a co-regulatory approach, and thought that Ofcom would be the most appropriate single regulator, and were broadly not in favour of the proposals set out in the consultation.

4.6 - Church groups and religious organisations

The consultation received numerous responses from churches, church groups, and other organisations with religious affiliations. The **Church of England**, **Christian Concern and the Christian Legal Centre**, and **Christian Action Research and Education** (**CARE**), amongst others, all indicated strong support for the introduction of age verification controls for online pornography. The **Church of England** suggested that the regime proposed could be: “Very effective, provided that the definition, scope and approach were sufficiently robust, especially in relation to providers located outside the UK”.

CARE’s response also supported the policy aim, and the introduction of AV controls for all pornography rated 18 or R18. Further, the response referenced Baroness Howe’s Online Safety Bill, and recommended that the Government adopt an approach consistent with part 3 of that Bill - which would require all operators providing pornography services to UK users, wherever they are based, to be

licensed, and also for a criminal rather than civil enforcement regime to be introduced. Many emailed responses from individuals (174 respondents) to the consultation echoed these views, and a significant number of these were reproduced verbatim.

4.7 - Internet Service Providers (ISPs)

All of the 'big four' ISPs (BT, Virgin Media, TalkTalk and Sky) responded to the consultation, as well as the Internet Service Providers Association (ISPA), the trade body which represents over 200 companies in the United Kingdom.

BT indicated that they agreed with the establishment of a civil regime, and said that new legislation would mean greater consistency between the online and offline worlds. They also stated that the new law needs to be flexible enough to adapt to a fast-changing technological and business environment.

Sky's response highlighted the successes to date of the child protection work undertaken by them and other ISPs on a voluntary basis, and stressed that "...default on provision of network filtering is a simpler way of achieving the policy objectives." Sky also reference ISP blocking in their response, noting that this was not part of the Government's preferred approach, and highlighting an Ofcom report in 2010 which said that ISP blocking (in that context, in respect of IP infringing websites) would not be effective.

The response submitted by **ISPA** made similar points with regard to blocking, and concerns over its efficacy. They welcomed the focus on content providers rather than access providers, and on the issue of blocking by ISPs, suggested that this would be disproportionate, ineffective and costly. They indicated that this would not be "...a viable way forward, as network level blocking can be easily circumvented and carries adverse risks."

TalkTalk also supported the overall approach, and blocking by ISPs not being part of the enforcement regime, reasoning this would be "...far more complex and legally challenging". They also suggested that "… an ISP blocking system penalises innocent adults, who would find themselves unable to access popular websites. We should be mindful that the majority of households in the UK do not have children."

TalkTalk's response also highlighted the increasing importance of apps (a point made by the BBFC, above, and several other responses from individuals and other stakeholders).

Virgin Media's response was supportive of a civil enforcement regime, noting this would be consistent with other approaches to age verification, and reasoning that: "...given the international nature of many of the sites and companies involved, pursuing civil penalties is likely to be most effective in changing business practices." The response also highlighted the importance of digital skills and resilience for young

people online, and that "...supportive and enabling parenting does more to foster resilience than parents who restrict or monitor internet use."

4.8 - Mobile network operators (MNOs)

Mobile UK (formerly Mobile Broadband Group) supported the application of age verification for still and moving images, as per the BBFC's Classification Framework. Mobile UK strongly believed that the BBFC should be responsible for determining what content is in scope, and that age verification proposals should apply to all organisations, irrespective of their size. Overall, their response indicated support for the government's objectives.

Three believed that age verification methods should apply to all forms of online pornography, including still and moving images. **Vodafone** supported the government's proposals for age verification for online pornographic material. "In bringing in such a system, it is important that the right balance is struck and we support the focus in the consultation document on the providers of such sites. We believe it is right that the burden of responsibility should lie with them."

Telefonica O2 supported the government's proposals for age verification and stated "...an approach which complements and builds on both the existing successful technology solutions and initiatives to engage, guide and help parents and children should help make the online world a safer place for kids and therefore is one we support."

Annex A - Organisations which responded to the consultation

Alliance for Intellectual Property	Kerith Community Church
Association of School and College Leaders (ASCL)	Kidscape
Bacon's College	Lancashire Care NHS Foundation Trust
Barnardo's	Lattimore Hall (Church)
Baroness Howe of Idlicote	Local Mums Online
British Board of Film Classification (BBFC)	Lord Morrow of Clogher Valley
Bede's School	Mastercard
Bowsprit International Ltd	Mediawatch UK
Brass Horn Communications	MindGeek
British Fetish Film Festival	Mobile UK
British Association of Screen Entertainment	Netcollex Ltd
Brook	Norland College
British Telecommunications (BT)	North Huddersfield Trust School
BTM LifeLight Project	National Society for the Prevention of Cruelty to Children (NSPCC)
Campaign Against Censorship	Not Buying It
Chartered Trading Standards Institute	Office of Communications (Ofcom)
Cheshire East Council - Children's Services	Omega Communications
Child Protection Training Development	Parent Zone
Childnet	Paula Hall Ltd
Children's Charities' Coalition on Internet Safety	Police Scotland
Christian Action Research and Education (CARE)	Portland TV

Christian Concern	Primetime TV (UK) Ltd
Christian Legal Centre	Rape Crisis Scotland
Chris Lowrance Illustration + Design	RDI (UK) Holdings Ltd
Church Hill Primary School	Rewired
Church of England	Sex & Censorship
Child Protection Abuse Investigation	Safecast
Professor Clarissa Smith, Sunderland University	Sky
Cupidon	South West Grid for Learning Trust
Digital Policy Alliance	St Bernadette Catholic Secondary School
Dr Julia Hornle, Queen Mary University	TalkTalk
End Violence Against Women Coalition	Tavistock and Portman NHS Foundation Trust
Evangelical Alliance	Telefonica O2
Family Education Trust	The Centre for Gender Equal Media
Family Online Safety Institute	The UK Cards Association
Family Planning Association	The Diana Award
Forres Sandle Manor	The National Police Chiefs Council (Child Protection Abuse Investigation Working Group)
Fostering People	The Reward Foundation
Get Safe Online	Think Radio
Girlguiding	Three UK
Gloucestershire Constabulary	Virgin Media
GOTR SRE Consultancy Limited	Visa Europe
Groundlevel Network	Visible Ministries

Hubpeople Ltd	Vodafone
ICM Registry	xbiz
ICT4C	Yoti Ltd
International Entertainment Adult Union	
Internet Service Providers' Association	
Image Analyzer	
Information Commissioner	
Internet Matters	
Internet Advertising Bureau	

Annex B - Questions in the consultation

Question 1: In your opinion, should age verification controls be placed on all forms of legal pornography ('sex works') online that would receive a British Board of Film Classification rating of 18 or R18?

a. Yes
b. No
c. Don't know

Question 2: Do you think age verification controls should be placed on sites containing still as well as moving images of pornography?

a. Moving images only
b. Still and moving images
c. Neither still nor moving images
d. Other (please specify)
e. Don't know

Question 3: To what extent do you agree with the introduction of a new law to require age verification for online pornographic content available in the UK?

a. Strongly agree
b. Agree
c. Neither agree nor disagree
d. Disagree
e. Strongly disagree

Question 4: If age verification controls are to be required on pornographic websites, how do you think they should work (select all that apply, and please suggest other ideas that you may have).

a. Confirmation of credit card ownership or other form of payment where mandatory proof that the holder is 18 or over is required prior to issue.
b. A reputable personal digital identity management service that uses checks on an independent and reliable database, such as the electoral roll.
c. Other comparable proof of account ownership that effectively verifies age. For example, possession and ownership of an effectively age-verified mobile phone.
d. Other (please give details)

Question 5: Do you agree that a regulator should have the power to direct payment and other ancillary services to remove their services from non-compliant websites? Please give reasons.

a. Yes
b. No
c. Don't know

Question 6: Do you have any suggestions for other actions that could be taken to ensure that commercial providers of online pornography comply with the new law? Please give details.

a. Yes
b. No

Question 7: Do you think that the regulator should have the power to direct parent and umbrella companies of pornographic websites to comply?

a. Yes
b. No
c. Don't know

Question 8: Do you agree with the introduction of a civil regime to regulate pornography websites? Please explain your answer.

a. Yes
b. No
c. Don't know

Question 9: Would the introduction of a new criminal offence be a better form of regulation?

a. Yes
b. No
c. Don't know

Question 10: To what extent do you agree with the introduction of a new regulatory framework?

a. Strongly agree
b. Agree
c. Neither agree nor disagree
d. Disagree
e. Strongly disagree

Question 11: Should a new framework give powers to a regulator/ regulators to (select all that apply):

a. Monitor compliance with the new law by pornographic websites
b. Notify non-compliant sites (and the companies that run them) that they are in breach of the new law
c. Direct non-compliant sites (and the companies that run them) to comply With the new law
d. Notify payment providers and ancillary services of non-compliant sites on which their services are available, that the site is in breach of the new law and has not implemented age verification (despite direction from the regulator)
e. Direct payment providers and ancillary services to withdraw services from non-compliant sites
f. Issue fines to non-compliant sites

Question 12: Do you think that a co-regulatory approach involving more than one regulator would be appropriate in this context?

a. If yes,
   - which regulator(s) should have a role?
   - which (if any) other stakeholders should have a role (e.g. industry)?
   - what should their respective roles be (please refer to the list of potential roles at question 11)?

b. If no,
   - do you think that a single regulator would be more appropriate? If so, please specify which regulator, if you have a view.

c. Don't know

Question 13: Do you agree that the regulator's approach should focus on having the greatest proportional impact, for instance by looking at the most popular sites, or those most visited by children in the UK?

a. Yes
b. No
c. Don't know

Question 14: Wherever new regulation is proposed, the Government must consider impacts on smaller and micro-sized businesses (those with fewer than 50 employees) based in the UK, and whether these impacts are proportionate. **Should smaller and micro-sized businesses (such as some payments and ancillary services) be exempt from the scope of the policy?**

a. Yes
b. No
c. Don't know

Question 15: Overall, are you broadly in favour of the proposals set out in the consultation?

a. Yes
b. No
c. Don't know

Question 16: How effective do you think the Government's preferred approach would be in preventing children from accessing online pornography?

a. Extremely effective
b. Very effective
c. Moderately effective
d. Slightly effective
e. Not effective at all
f. Don't know

Annex C - Summary of graphs

Page no.	Figure	Summary
5	1	*Estimated weekly hours of media consumption, at home or elsewhere among users, 8-11s and 12-15s: 2005 and 2015.*
16	2	Age and gender of respondents to the age verification consultation.
17	3	In your opinion, should age verification controls be placed on all forms of legal pornography ('sex works') online that would receive a British Board of Film Classification (BBFC) rating of 18 or R18?

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