

Dear department for Digital, Culture, Media and Sport,

I am responding to both the open consultation regarding "Requirements for Video Sharing Platforms in the Audiovisual Media Services Directive" and also the general points regarding online harms and safety,

A concern would be the idea that had/has been proposed which concerns implementing a "robust age verification" scheme for social media and also adult content websites, my view would be there would be several serious security concerns. Firstly, a widespread or targeted hacking, phishing or interception by cyber actors, criminals or other entities could attempt or in practice gain access to someone's account, password and or the server that is storing said information, which in turn could potentially lead to an individual's account and or identity being misused.

Regarding the robust age verification scheme that has/had been proposed for social media, if for example Facebook decide to have one service for under 18s and one for 18 and over, this would significantly increase the risk to under 18s by having the possibility of either a hacker, other entity or an individual over the age of 18 using credentials, password or other methods to gain access to the website marked for under 18s or vice versa. This will lead to the presumption and complacency that any user posting and communicating within the service is of the correct age.

A concern of mine is that the sheer volume of content being uploaded every day simply cannot be moderated effectively while balancing freedom of speech and expression, this will inevitably lead to overblocking and censorship of services which, in turn, could lead to users accessing even more extreme material. The UK should not follow the likes of Russia and China in heavily blocking, restricting or censoring content or the internet etc.

Finally, I feel the best way to protect under 18s is to provide education which focuses on the need to inform young people of the dangers as well as the benefits of being online; Scepticism by who young people should be communicating with, i.e. making sure they are informed of strangers online etc as well as the wide range of content is ultimately the best initiative. Providing robust age verification for social media and also adult content will lead to a complacency that all users are the correct age, as well as providing a platform that could lead to the abuse of age credentials which in turn could lead to the misuse of identities.

Many thanks

Yours faithfully

Christopher Files