



UK Content Standards Policy

Executive Summary

This document describes O2's UK Content Standards Policy. Some content services should not be published at all and some should only be available to customers who are 18 or older. Other services such as chat or location services are the subject of further guidelines to which this document refers.

This policy applies to all content services published by O2 and our partners and services on the open Internet. It includes details of our approach to age based restrictions and the tools that are to be available to parents to help them protect their children on the mobile Internet.

ALL RIGHTS RESERVED

This is an unpublished work. No part of this document may be copied, photocopied, reproduced, translated or reduced to any electronic or machine readable form without the prior permission of O2 plc

Document Information

Document name:	Content Standards Policy
Document Author:	Jonny Shipp
Owner while current:	Jonny Shipp
Owner's Telephone No:	07730 547355
Next review date:	December 1 st 2005
Retention period:	Whilst current

Change History

Version	Date	Changed by	Main Changes
0.1	21/02/2005	Jonny Shipp	First outline for discussion
0.2	20/04/2005	Jonny Shipp	Comments from Content Standards Forum
0.3	21/04/2005	Jonny Shipp	Comments from Richard Sedgwick
0.4	25/04/2005	Jonny Shipp	Comments from Richard Brown
0.5	28/04/2005	Jonny Shipp	Comments from Ian Roy and Jocelyn Roberts
0.6	05/05/2005	Jonny Shipp	Comments from Content Standards Forum
0.7	09/05/2005	Jonny Shipp	Comments from John Talbot and Richard Sedgwick
0.8	12/05/2005	Jonny Shipp	Comments from Ian Roy and Rachael Davidson
0.9	26/5/2005	Jonny Shipp	Comments from Content Standards Forum, roaming input from Ian Roy
1.0	08/07/2005	Jonny Shipp	Final draft for approval following review by Content standards forum and board discussion of Post-pay default settings & i-mode policy on 04/07/2005 (presentation at Appendix 1)
Issue 1	20/07/05	Jonny Shipp	Following final review by Content Standards Forum on 15/07/05

Circulation

Content Standards Forum

Final version to be available to O2 staff (intranet)

A public version of this document will be published at
www.o2.com/contentstandards

Contents

1	Background	5
1.1	Policy Statement	5
1.2	Scope	5
1.3	Responsibilities	5
1.4	Policy Owner	5
1.5	Implementation, reviews, changes, clarification	6
2	Overview	7
3	Definitions	8
3.1	Age Verification	8
3.2	Parental Control	8
3.3	Moderation	9
3.4	18 classification Audiovisual Services.....	9
3.5	Chat and community services	9
3.6	Gambling services.....	10
3.7	Passive location based services	10
3.8	Text (SMS) only content services.....	10
4	Policy.....	11
4.1	Services offered by O2.....	11
4.1.1	18 classification Audiovisual Services.....	11
4.1.2	Chat and community services	11
4.1.3	Gambling	11
4.1.4	Location based services.....	11
4.1.5	Text (SMS) only content services.....	11
4.1.6	Accessibility.....	12
4.2	Third party commercial services.....	12
4.2.1	18 classification Audiovisual Services.....	12
4.2.2	Chat and community services	12
4.2.3	Gambling	12
4.2.4	Location based services.....	13
4.2.5	Text only content services.....	13
4.2.6	Accessibility.....	13
4.2.7	General quality of services offered.....	13
4.3	Internet services and unofficial i-mode services.....	13
4.4	Provision of information and advice to customers.....	13
4.5	Illegal Content Reporting.....	14
4.6	Other Best Practice Guidelines	14
5	Enforcement.....	15
5.1	Internally.....	15
5.2	Externally.....	15
6	Audit.....	17

1 Background

1.1 Policy Statement

O2 will offer content and services that we believe our customers expect and demand, and which are consistent with our brand values. O2 will not provide access to content deemed to be adult in nature, without providing consumers with the means by which they can choose for them or their children, to prevent access. We will make every endeavour to protect the vulnerable from inappropriate content.

This policy document sets out in detail our approach to Content Standards in the UK. It is O2's policy to comply with relevant UK law and regulation and meet our commitments to agreed UK industry self-regulation, O2's corporate responsibility commitments and our strategy to simply deliver the best customer experience. In particular, this policy reflects UK board decisions about adult content and protecting the vulnerable and the Code of Practice for the self-regulation of new forms of content on mobiles, published in January 2004 (see Appendix 1 and 2).

Requirements set out here must be met before content services are made available on the O2 UK network.

1.2 Scope

This policy covers all content services available to customers via the O2 network.

This policy does not cover person-to-person¹ communications services or malicious communications².

Unsolicited bulk communication (spam) is covered by a separate policy.

1.3 Responsibilities

It is the responsibility of the relevant managers to ensure that those affected by this policy, internally and externally, are informed of its requirements and required to comply with it.

Internally, relevant managers include product managers (content, data, portal and messaging services managers) and relationship managers (wholesale data support, interactive product sales).

Externally, those affected by this policy include suppliers of content and data services to O2, third parties and business partners who deliver content and data services to O2 subscribers through their O2 phone or O2 web properties such as o2.co.uk.

1.4 Policy Owner

O2 UK Marketing Director

¹ Person to person communication is where at most two people can view or send messages between each other.

² O2 will however take action if we believe a customer is in breach of their terms and conditions of service.

1.5 Implementation, reviews, changes, clarification

The UK Content Standards Forum is responsible for implementing this policy, keeping it under review and proposing changes to it. If it is unclear how the policy applies to a particular product then clarification should be sought from that forum.

Queries regarding this Policy should in the first instance be referred to the Head of Content Standards.

2 Overview

The policy sets out the *controls* that must be in place for each *content service type*, in three sections:

- Services offered by O2
- Services offered by *third parties under commercial agreements with O2*
- *Internet services* that are available through the O2 network but where there is no commercial agreement between O2 and the service provider.

Two further sections of the policy cover the provision of information and advice to customers, and the reporting of illegal content.

The following table sets out in summary the *controls* that must be in place (cells) for given *content service types* (rows) where each section of the policy applies (columns).

	<i>Services offered by O2 (paragraph 4.1 below)</i>	<i>Third party commercial services³ (4.2)</i>	<i>Internet services (4.3)</i>
<i>18 classification audiovisual services (3.4)</i>	Not allowed	Age Verification required (3.1)	Users must have the opportunity to activate Parental Control to their phone number.
<i>Chat and community services (3.5)</i>	Must be moderated (3.3). Dating services allowed but Age Verification required (3.1).	Must be moderated (3.3) or Age Verification required (3.1). Official i-mode services must always be moderated.	
<i>Gambling (3.6)</i>	Age verification required (3.1)	Age verification required (3.1)	
<i>Passive location based services (3.7)</i>	Must comply with Code of Practice ⁴	Must comply with Code of Practice	
<i>Text only content services (3.8)</i>	Sexual Entertainment Services not allowed	Adult short code and compliance with ICSTIS Code required for Sexual Entertainment Services	

Controls and content service types are defined below.

³ Includes official i-mode services

⁴ Not currently offered.

3 Definitions

Controls

3.1 Age Verification

O2 provides the capability for users to demonstrate that they are 18 or older by presenting identification at any O2 store or entering credit card details into a WAP application. A user who has successfully passed through this process is described as an Age Verified user. Other Age Verification methods may be added by O2 from time to time.

For the purposes of access controls O2 assumes that all users are not 18 or older until they have been through a process of Age Verification, either remotely or in an O2 store. Authentication as a post-pay account holder by Customer Services is acceptable as a means of Age Verification.

For the purposes of Age Verification and access controls based on Age Verification, a mobile phone number is assumed to identify the user and restrictions are associated with a given mobile phone number.

The Age Verification information is held in O2's Shield database. When a user requests a service, third party service providers and official i-mode content providers can access this data in order to check whether or not a user has Age Verified.

Where Age Verification is required the service must only be delivered to the user if confirmation is received from O2 that the user has Age Verified.

As set out in section 4 below, Age Verification is required for example where 18 classification audiovisual content is either published by O2 or where the publisher has a commercial relationship with O2. However Age Verification is not required in relation to Internet content, where O2 has no commercial relationship with the publisher

3.2 Parental Control

Parental Control is available to and can be activated by O2 users. It is not an automatically activated setting. When activated Parental Control restricts Internet access to a *white list* comprising a limited number of sites that are suitable for all ages.

For the purposes of Parental Control a mobile phone number is assumed to identify the user and restrictions are associated with a given number.

Once Parental Control has been activated it can be turned off by a subscriber entering a PIN provided at the time of activation. If a customer has forgotten or otherwise does not know the PIN for a given phone number they must demonstrate that they are 18 or older before the control will be removed.

Internet sites that appear on the white list must not be classified as 18 against the IMCB framework and should be assured by the content provider as suitable for children of all ages. Content services appearing on the white list must be provided as part of a commercial relationship with O2.

3.3 Moderation

Moderation helps safeguard O2's reputation by reducing the risks associated with abusive or threatening content, racist messages, illegal content, physical contact between children and adults and theft of intellectual property.

Where services are not restricted to age verified users and there is a risk of contact between children and adults with a sexual interest in them – i.e. grooming – the primary objective of moderation is to prevent such contact.

For all services requiring moderation, whether restricted to age verified users or not, an objective of moderation is to prevent and remove content that may be offensive to other users or illegal.

Moderators should be familiar with the process for escalating cases to O2's Nuisance Call Bureau who in turn can contact the police.

Content service types

3.4 18 classification Audiovisual Services

Audiovisual services include pictures, video, mobile games and music services.

These are the subject of the classification framework published by the Independent Mobile Classification Body (IMCB) at www.imcb.org.uk.

The IMCB is responsible for maintaining a common UK mobile industry definition of 18 classification for these content types on mobiles.

3.5 Chat and community services

Chat and community services are public forums that enable messages and images to be posted and retrieved by other users who do not necessarily know each other. Includes Blogging and user generated content services like MyWap.

The following services are not defined as chat services for the purposes of this policy:

- Instant messenger in which users can form their own private forums made up only of people who already know one another
- One to one chat, in which communication is between only two people and no additional user is able to join this discussion.
- Chat services in which the user interacts only with an operator or a machine and there is no contact with other users.

- Services that are not consumed on a mobile phone, but may involve using a mobile to post text or pictures to another media environment such as television.

Note however that the above services may be covered by Best Practice Guidelines issued by the Home Office, with which O2 services should comply.

3.6 Gambling services

Gambling services include any lottery, betting or gaming service which includes the playing of a game of chance for the opportunity of winning in money or similar prize where the player also risks losing money or similar.

3.7 Passive location based services

Location based services use location data to provide content and services. Active location services provide information on request from a user. Passive location services enable someone else to establish the location of a user either from another mobile phone or from a computer.

3.8 Text (SMS) only content services

These are services in which a text (SMS) message or series of messages comprises the entire content service offered (as opposed to making up a part of the service as is the case where a premium text message is used as a way to collect payment for services).

These services are normally delivered using premium rate numbers and therefore regulated by ICSTIS. The ICSTIS Code of Practice and Guidelines published at www.icstis.org.uk define sexual Entertainment Services.

4 Policy

4.1 Services offered by O2

These are content services provided by O2 to our mobile subscribers. O2 is the publisher of these services and so has control over the content delivered. This commercial control is the basis of the following requirements.

It is O2's policy that:

4.1.1 18 classification Audiovisual Services

Content classified as 18 in the IMCB framework is not allowed. For still images or slideshows this aligns to level 2.3 or above on the Waat Media framework (see Appendix 3) level 2.2 and below is allowed.

4.1.2 Chat and community services

All public forums must be moderated to O2 guidelines (Appendix 4). Moderation and filtering must prevent contact unless the service is restricted to age verified users.

Dating services are intended to facilitate meetings between strangers and where contact is facilitated age verification must be required.

Where moderation is required, detailed and service specific moderation guidelines should be in place.

4.1.3 Gambling

Betting, lottery and gaming services are allowed but services must only be made available to Age Verified users. Any Gambling services that are offered by O2 will comply with the Gambling Act 2005 and all other regulatory requirements.

4.1.4 Location based services

Passive location based services must comply with the Industry Code of Practice for the use of mobile phone technology to provide passive location services in the UK (Appendix 6). This code defines traceability, registration, identification, and alerting features that are required for passive services used by people under 16 years old and requires clear instructions to be provided for turning such services off.

Active location based services must comply with relevant data protection law and regulations.

4.1.5 Text (SMS) only content services

Sexual Entertainment Services not allowed.

All services must comply with O2 spam policy (Appendix 8).

4.1.6 Accessibility

All content services must comply with O2's WAP Accessibility Initiative (WAI) guidelines published at vitalo2.pri/about/accessibility.asp.

4.2 Third party commercial services

These are content services delivered under a contractual relationship with O2 to our mobile customers including official i-mode services. O2 is the delivery and access provider and thus exercises an element of commercial control over the content delivered. This commercial control is the basis of the following requirements.

It is O2's policy that:

4.2.1 18 classification Audiovisual Services

Content classified as 18 under the IMCB framework must only be made available to Age Verified users.

4.2.2 Chat and community services

Chat services, including text only services that allow strangers to contact one another must be moderated to O2 standard or made available only to Age Verified users.

Dating services are intended to facilitate meetings between strangers and must be restricted to Age Verified users.

4.2.3 Gambling

Betting, lottery and gaming services allowed but services must be restricted to Age Verified users.

Where a prize draw or competition is offered by O2, or one of its partners, similar to some forms of betting, these prize draws and competitions will require Age Verification before any winnings can be claimed. An example of such a competition is a Reverse Auction. O2 will require all providers to take note of the necessary regulatory requirements and will in some cases set Age Verification as a requirement for entry.

O2 may also offer competitions and prize draws, as general promotional tools that will not require Age Verification and may be entered by a range of methods including SMS, MMS and email. An example of such a competition is a promotion to win tickets to see a band that can be entered via text message.

4.2.4 Location based services

Passive location based services must comply with the Industry Code of Practice for the use of mobile phone technology to provide passive location services in the UK (Appendix 6). This code defines traceability, registration, identification, and alerting features that are required for passive services used by people under 16 years old and requires clear instructions to be provided for turning such services off.

Active location based services must comply with relevant data protection law and regulations.

4.2.5 Text only content services

Sexual Entertainment Services must be delivered in accordance with the Code of Practice for common adult short codes.

All services must comply with O2 spam policy (Appendix 8).

4.2.6 Accessibility

All content services must comply with O2's WAP Accessibility Initiative (WAI) guidelines published at vitalo2.pri/about/accessibility.asp.

4.2.7 General quality of services offered

It is O2's policy to require third party Service Provider to agree to our standard terms before they are permitted to use of O2's network to provide services to customers. These terms include the requirement that Service Providers ensure that their Services are of a quality and kind which are not likely to bring O2 into disrepute.

4.3 Internet services and unofficial i-mode services

Internet services are services where O2 provides only Internet connectivity and has no commercial relationship with the service provider or publisher.

O2 customers must have the opportunity to apply Parental Control to their phone number.

4.4 Provision of information and advice to customers

Information for customers about the capabilities of mobile phones, the risks to the vulnerable associated with these capabilities and the measures that can be taken to mitigate these risks should be available through O2 web sites and in O2 stores.

Support should be available to customers who have problems with nuisance calls, unwanted, harmful or illegal content. Customer services teams – such as the

Nuisance Call Bureau – that are involved in providing this support must be provided with any necessary specialist training or advice services. As appropriate, such teams should maintain a close working relationship with the police.

4.5 Illegal Content Reporting

Where illegal content is brought to O2's attention it should be blocked from the O2 network and the relevant policies agreed with the IWF and authorities followed.

All staff and partners involved in managing, providing or supporting content services should be aware of the process for passing reports of potentially illegal content to the IWF (Appendix 5).

4.6 Other Best Practice Guidelines

It is O2's policy to keep under the review developing Best Practice in the area of child protection and is committed to assessing relevant best practice standards to protect its customers.

O2 is a member of the Home Office Task Force on Child Protection and is committed to adopting Home Office Guidelines in so far as they are relevant to mobile services.

5 Enforcement

5.1 Internally

Failure to meet requirements of this policy may result in disciplinary action.

5.2 Externally

Failure of suppliers or business partners (including premium text service providers and i-mode official content providers) to meet the requirements of this policy may lead to the termination of business relationships and withdrawal of services.

Stage 1

If O2 believes that a service is being offered that does not comply with this policy, a warning notice will be issued to the service provider requiring compliance within one week.

Alternatively O2 may at its discretion immediately suspend a service, as permitted under the terms of O2's Service Provider Agreement, where in O2's opinion the continuation of the service has an adverse impact on O2's customer's and O2's interest.

If there is a dispute about the classification of a content service then the service provider must raise this formally with O2 within that week.

If, on reviewing the service against the Independent Mobile Classification Body (IMCB) classification framework O2 still believes that the service does not comply with this policy, then a second warning notice will be issued to the service provider requiring compliance within one week. At this point the service provider may be able to appeal to the IMCB if they believe that the service has not been correctly classified by O2.

Stage 2

Where the warning notice period has expired, O2 believes that the service still does not comply with this policy, and no appeal is in progress with IMCB, then a notice of suspension will be issued. This notice will require compliance with this policy within one week and will serve notice that O2 will suspend the service if this is not demonstrated within that week. The matter will at this stage also be referred to the Head of Compliance.

Alternatively O2 may at its discretion immediately suspend a service, as permitted under the terms of O2's Service Provider Agreement, where in O2's opinion the continuation of the service has an adverse impact on O2's customer's and O2's interest.

Stage 3

Where the suspension notice period has expired and O2 believes that the service still does not comply with this policy then the service will be suspended immediately. Suspension will continue until it is demonstrated to O2 that the service is fully compliant with this policy.

6 Audit

O2 will from time to time conduct audits to satisfy itself that this policy is being complied with – both internally and externally.

Appendix 1 – UK Board papers.



"Content Standards
UK board June 05 - 2



adult-300904-v6.ppt



"UK Code of Practice
& Project Shield July



adult-011203-v3.ppt

Appendix 2 - UK Code of Practice for the self-regulation of new forms of content on mobiles



"Code of Practice
January 2004.pdf"

Appendix 3 – Watt Media Classification Framework



"Watt Classification
Recommended Apr05

Appendix 4 – O2 community and chat services



C:\Documents and
Settings\Jonny\My D

Appendix 5 – Process for reporting illegal content



"DRAFT Guidelines
for suppliers of UK cc

Appendix 6 – Industry Code of Practice for the use of mobile phone technology to provide passive location services in the UK



"LBC Code of
Practice.pdf"

Appendix 7 – Customer services process

yourcompanion.uk.pri.o2.com/new/processes/pov.asp?pn=4413&dp=1&db=undefined

Appendix 8 – Spam policy



"Spam Policy.pdf"