

Audience protection measures in practice

Review of Audience Protection Measures on On-Demand Programme Services

Report

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1. Overview

Ofcom is placing new standards requirements on streaming services (known as on-demand programme services, or ODPS) which people in the UK watch across a range of platforms and devices. Well-known ODPS providers include Disney+, Amazon Prime Video, BBC iPlayer and Now¹.

As well as implementing a new code for content standards on certain streaming services², Ofcom now has a duty to examine how currently regulated ODPS providers are protecting their audiences with measures such as age ratings, content warnings, parental controls and age assurance.

We have been assessing whether these audience protection measures ("APMs") are adequate to assist providers to comply with their duties to protect audiences from harm, and this report contains our findings. To compile it, we used our information-gathering powers to understand what APMs ODPS providers currently have in use, and we commissioned research with audiences to explore how they perceive the measures. We also engaged with other regulators and industry.

What we have found in brief

- Widespread adoption. ODPS providers are using APMs such as age ratings, content warnings and parental controls on their services where necessary, and in ways which we considered broadly adequate to assist them to protect audiences from harm.
- Different approaches. Providers have adopted a range of approaches to offering age ratings, classification tools and content warnings. Given the wide range and type of regulated services – from traditional UK broadcasters to global platforms – there is no single solution or system for audience protection.
- Some adaptation for UK audiences. Some regulated global subscription-based ODPS providers have taken steps to adapt their content classification approach to align with the expectations of UK audiences.
- Audience preferences. Viewers prefer content warnings to be clear and detailed, with more information around challenging issues and, in the case of episodic content, for warnings to be targeted at issues contained in specific episodes.
- Lack of information. Services could provide more information as to how viewers can find and use the protection tools available to them, so they can manage their viewing safely and with confidence.
- Viewers like parental controls and PINs, particularly if they have parental responsibility, and particularly controls that can be targeted to manage access across different age groups. But these tools are not always working consistently across different devices.
- Need for proportionality. Audiences want protection measures that are proportionate to the risk of harm and do not create unnecessary friction in their viewing experience, or intrude on data privacy.

¹ Our review did not assess the services of some notable providers with UK audiences such as Netflix, YouTube or Apple TV. In the case of Netflix and Apple TV, this is because these on-demand services are not currently within Ofcom's jurisdiction, which means they were outside the scope of our review. In the case of YouTube, besides the fact that a small group of ODPS exist on YouTube channels, the service as a whole is not subject to the ODPS Rules. YouTube's user-to-user service, however, is regulated under Ofcom's online safety duties. ² "Tier 1" ODPS. At the time of publication of this report, the Secretary of State has not made regulations to determine which services are Tier 1. This report refers to the future new code as the "Tier 1 Standards Code".

2. Introduction

Background

To date, on-demand services which fall within Ofcom's jurisdiction have been subject to the ODPS Rules which are set out in Part 4A of the Communications Act 2003 ("the Act"). These rules contain a range of editorial and administrative provisions, including requirements for providers to notify Ofcom, pay fees and ensure that services provide appropriate protection for under-18s. With the exception of the BBC's iPlayer, ODPS are not subject to Ofcom's Broadcasting Code, which sets out more exacting standards for content, including provisions relating to harm and offence, due impartiality, and fairness and privacy.

The Media Act 2024 ("the Media Act") introduced significant changes to the existing framework for Video-on-Demand ("VoD") regulation under Part 4A of the Act. The Secretary of State has the power to make regulations to specify which ODPS, including non-UK ODPS, fall under enhanced regulation. The regulations may specify a service by name, or set out a description of parameters to define which services fall within Tier 1. As well as being subject to enhanced regulation, such services will also have to comply with their current duties under ODPS Rules. As part of the enhanced regime, Tier 1 services will be required to comply with the new Tier 1 Standards Code ("Tier 1 Code"), which will be more closely aligned with the requirements of the Broadcasting Code.

Ofcom's duty to review audience protection measures

Section 368OB of the Act³ requires Ofcom to review, as soon as is practicable, the APMs currently in use on ODPS or non-UK ODPS that are Tier 1 services⁴.

The scope of that review is to consider whether the APMs are adequate for the purpose of assisting the currently regulated providers to comply with the duties imposed on them by or under the Act for the protection of audiences from harm.

In this review, we did not consider or assess the services of certain notable on-demand providers with UK audiences e.g. Netflix or Apple TV. At the time of writing, as the Secretary of State has not made regulations to determine which services are Tier 1, our review has focused on ODPS. A review of APMs used by non-UK Tier 1 ODPS will follow after the regulations have been made and we know which non-UK ODPS are to be regulated as Tier 1 services.

Section 368OB defines "audience protection measures" as measures that are capable of assisting in protecting audiences from harm, and provides the following as examples of such measures:

- a) age rating or other classification systems;
- b) content warnings;
- c) parental controls; and
- d) age assurance measures.

³ Amended by s.38 of the Media Act 2024

⁴ The full legal duty is set out in <u>s3680B Communications Act 2003 (Audience protection reviews etc)</u>.

Our approach to this review

This is a factual report based on our first review of APMs. Our findings are based on the following methodology:

- utilising our information gathering powers to ask selected ODPS providers about the APMs they have in place;
- extensive desk research and mapping of services, including user journeys on different platforms and devices;
- insights from audience research commissioned by Ofcom; and
- stakeholder engagement with providers, regulators and wider industry.

We have rooted this review around four overarching principles for Ofcom. We have sought to remain:

- outcomes focused (exploring whether the combinations of APMs used by each service have the desired outcome of protecting audiences from harm);
- audience led (focusing on what audiences find useful to help protect themselves and their families);
- industry aware (keeping in mind the aims and practical constraints of providers and companies); and
- technology neutral (giving consideration to emerging technological innovation rather than prescribing specific systems, tools or solutions).

These principles underpinned our analysis and assessment of APMs throughout our review. They informed our questions and analysis when we made formal requests for information (using our information gathering powers) asking providers about the APMs in use and their approaches to protecting UK audiences from harm. We also used these principles to focus our detailed user testing and desk research – looking at, for example, information available to viewers about APMs, where those APMs feature on different services and platforms and how they work, alongside new qualitative research asking audiences for their current experiences and expectations of APMs. Combined with detailed policy analysis and industry data we have built a picture of the current landscape for audience protection. A summary of the wider VoD landscape is in Annex 1. This helps position the regulated ODPS that fall in scope of this current review into the broader on-demand ecosystem that is made up of different media models, types of content and audiences.

The review does not seek to approve or endorse specific proprietary solutions or tools, rather to consider the role that APMs can play within the broader aim of providing adequate protection to viewers from potentially harmful content on ODPS.

As set out above, we also commissioned research on audience perceptions of APMs currently in use on VoD services available in the UK, including those used by the regulated ODPS in scope. This is published alongside this report⁵.

⁵ Ofcom/Revealing Reality (2025) Understanding perceptions of Audience Protection Measures on Video-on-Demand platforms.

Defining "Harm" for the purpose of this review

Harm can have different connotations and meanings depending on the nature of the risk, type of content and specific audience that is watching. Context also plays an important role in defining what we mean by harmful content. However, our review duty links APMs to the duties imposed on services by the legislation, in particular under s368E of the Act, so this is an anchoring point around which to focus.

'Harmful material' under s368E of the Act covers incitement to violence or hatred⁶ and certain types of prohibited material⁷, all of which are types of material that ODPS must not contain on their service. Given that the use of protection measures would not be a proportionate response for material that is prohibited, for the purposes of considering whether APMs are adequate in nature, we are limiting our focus on harm around a specific rule in s368E which pertains to under-18s and **Specially Restricted Material.** Under the ODPS Rules, this material includes the following: video material with a BBFC⁸ R18⁹ certificate; material that would be likely to receive an R18 certificate if it were submitted to the BBFC for classification; or other material that might impair the physical, mental or moral development of under-18s¹⁰.

Further detail on how 'Specially Restricted Material' is defined can be found in Ofcom's On-demand programme services guidance which supplements the ODPS Rules. In summary, ODPS providers are advised to consider whether the material on their service is harmful through being age-inappropriate for under-18s, and if any of the following (non-exhaustive) examples could be relevant:

- sexual material;
- violence;
- depictions of dangerous behaviour (including the use of illegal drugs and the misuse of alcohol);
- material portraying eating disorders, self-harm or suicide;
- abusive and offensive language; and
- exorcism, the occult or the paranormal.

Examples of Audience Protection Measures (APMs)

The examples below are not an exhaustive list; providers may have other specific measures that could be used, either on their own, or in tandem with other measures to assist in providing overall protection to viewers.

⁶ Section 368E(1) of the Act.

⁷ Section 368E(2) of the Act.

⁸ The British Board of Film Classification ("BBFC") is the statutory film and video classification regulator for the UK and also works in partnership with many VoD providers who apply BBFC ratings to their content.

⁹ The BBFC's R18 category is a special and legally-restricted classification primarily for explicit works of consenting sex or strong fetish material involving adults. Films rated R18 may only be shown to adults in specially licensed cinemas, and video works may be supplied to adults only in licensed sex shops.

¹⁰ Section 368E(5) of the Act.

Age Ratings and Classification Systems

These types of APM categorise content based on suitability for different age groups. They often use familiar symbols, numbers or letters to indicate:

- a minimum recommended age;
- that material is generally unsuitable for younger viewers or suitable only for audiences of a particular age or over; and/or
- that the content was originally broadcast post-watershed.

Content Warnings

Content warnings are short notices usually shown before or during playback. They alert viewers to themes or issues – such as bereavement, violence or strong language – that may influence viewing decisions, especially for children.

Approaches vary and warnings may be audible or shown in text on-screen. Some warnings are general such as 'viewer discretion advised', while others specify issues for example, 'contains scenes of domestic violence' or indicate frequency and intensity such as 'contains frequent, graphic violence'. Similarly, some are presented in sentences, others group issues together, while some indicate strength, genre or intensity.

Additionally for services with legacy or catalogue content, warnings are sometimes used to contextualise historical works, for example, programmes or films which contain outdated terms or words which could be considered problematic by today's audiences.

Warnings may also appear as pop-ups, for example to alert viewers when parental controls are off, while others may flag specific scenes or signpost additional help or resources for viewers affected by content.

Parental Controls (including PINs)

These tools restrict access to content based on age or suitability. Controls may include:

- PIN-protected access which restricts specific content, or profiles;
- curated profiles with age-appropriate content selected by a service; and
- settings that allow parents to choose what other users can view via profiles.

Service-level controls may result in general profiles e.g. child profiles that restrict all users from viewing materials of a particular age rating or, for catch-up content, restrictions to content that was broadcast on linear television after the watershed.

User-level controls differ in complexity and can allow wider discretion. Potentially, this can involve different selections and restrictions on material under different profiles.

Age Assurance

Age assurance enables service providers to determine whether a user is an adult or a child, ensuring that only those users established to be an adult can access content deemed suitable for audiences aged over 18. Methods range from prompts requesting a user to self-declare their age (e.g. entering a date of birth) to photo-ID matching or age estimation using biometric facial analysis. We also recognise that age assurance methods are developing at pace.

3. Understanding Audience Protection Measures on OnDemand Programme Services

Our methodology for assessing APMs

Our starting point was to access each of the **239 ODPS** currently notified with Ofcom (as listed on the Ofcom website on 11 August 2025) to identify whether APMs were being used, which we did by using services and consulting their support pages. We then considered where and how the APMs that were in use operated to offer protections to viewers. Of the 239 ODPS on Ofcom's list of notified services, a small number were not currently operating in the UK and about one fifth were provided exclusively on social media platforms for sharing videos such as YouTube or on VoD service aggregators¹¹.

We also gathered further information from 24 ODPS¹² through formal information requests. These included the Broadcaster Video-on-Demand ("BVoD")¹³ services of Public Service Broadcasters ("PSBs") and services which fall under Category A of Ofcom's fee charging structure¹⁴ for ODPS¹⁵. In this way, while we have surveyed APM usage across all ODPS, we have had a particular focus through our information requests on services we considered were likely to be widely used by UK audiences¹⁶. This proportionate approach has enabled us to gain knowledge and insights into how regulated services that have the most significant impact on UK audiences are implementing measures¹⁷.

The services that were subject to our formal information requests were:

¹¹ Although we did not review the APMs of such ODPS due to the constraints on these services by virtue of being hosted by third-parties, the services nonetheless remain subject to the ODPS Rules.

¹² Some of these services were closely related (Virgin Store and Virgin On Demand; Sky On Demand, Sky Go, Sky Store and Now).

¹³ These are types of ODPS that are provided by broadcasters with associated linear TV services.

¹⁴ See On-Demand Programme Service Fees, Ofcom, 2 July 2025.

¹⁵ Given the scope of the Review, we did not consider it necessary or proportionate to seek information from every ODPS, nor every service of those providers to whom we put the request. Our research showed that we could adequately understand the use of APMs by Tier B and Tier C feepaying providers of ODPS, which are generally smaller, through desk-based research instead of through an information request. We also considered it more proportionate to place the regulatory burden of responding to an information request on the larger, Tier A fee-paying providers.

¹⁶ While we recognise that Tier-A fee-paying status does not precisely correlate to the UK reach of an ODPS, we considered it a reasonable measure of the potential of a service to impact UK users of such services. We requested information about the provision of APMs on providers' core services and not any associated services for which the provision of APMs was likely to be similar or the same. We also did not seek information on services found exclusively on social media platforms for sharing videos and services which were not the core business activity of their provider (except those with catalogues containing both content of potential to appeal to children and some content not suitable for all ages).

 $^{^{17}}$ We assessed other ODPS providers outside of this list through our own internal research and assessment.

Table 1: ODPS subject to formal information request by type of service

Туре	ODPS						
PSB VoD	BBC iPlayer	ITVX	Channel 4	5	STV Player	S4C Clic	
Global SVoD ¹⁸	Amazon Prime Video	Disney+	Paramount +	Discovery+	Hayu		
Commercial BVoD (and *associated TVoD ¹⁹ / **linear TV associated SVoD)	Sky On Demand / Sky Go	* Sky Store	**Now	U	Blaze	** Crime+ Investi- gation	
Other	Virgin Media On- Demand	Virgin Media Store	EE TV	Samsung TV Plus	War- hammer TV	BFI Player	

In assessing these ODPS we considered:

- access to the services (e.g. account creation, subscription/payment requirements, what devices services could be accessed from, terms and conditions);
- what APMs were used on these services, with particular focus on age ratings, content warnings, parental controls, and age assurance;
- how and in what form APMs were displayed on screen, including the level of information given in content warnings; and
- how APMs could be used by the audience.

Additionally, the information gathered through formal information requests helped us gain a further insight and understand:

- the various systems underpinning the age ratings or classifications on this group of services;
- how they communicate APMs to their audiences (e.g. instructions on how to apply parental controls); and
- details about how age ratings and content warnings were applied to content and what they mean.

We also took into consideration the type of service (e.g. PSB VoD, BVoD, SVoD), the type of content on offer, the target audience, and the duties on providers under the existing ODPS framework regarding harms and protection measures²⁰.

¹⁸ Subscription Video-on-Demand services are types of ODPS that are subscription-based in nature.

¹⁹ Transactional VoD ("TVoD") services are types of ODPS Offer consumers the ability to buy or rent individual pieces of content on a one-off basis.

²⁰ See under 'Defining "Harm" for the purpose of this review', Chapter 2, p.6.

The findings presented here are a snapshot of the APMs in use by ODPS at the time of research. We recognise that services' approaches to protection measures may have evolved since. We set out first our findings from across all the services we regulate.

What APMs do providers currently have in place?

The existing ODPS framework requires that APMs are appropriate to protect under-18s and that the measures taken are proportionate to the potential of the material to harm their physical, mental or moral development. This means the use of APMs is dependent on the nature of the content, audience, and other contextual factors. Among the services we did assess, we found the majority have some form of APMs in place.

Where measures were absent, we observed many services still introduce friction points, such as requiring viewers to sign-up or pay, which can offer a degree of protection. A small number of services provide unrestricted access, though we noted many of these fall within lower-risk, focused genres such as sport and local TV.

We also observed that approaches to APMs vary significantly across providers. For example:

- There is no single consistent system used for age ratings or classification systems.
- Content warnings, when used, vary from general notices like 'not suitable for younger viewers', to detailed alerts such as 'strong language, adult content and full-frontal nudity from the start and throughout'.
- Parental controls also differ; some platforms offer a single profile with basic PIN protection, while others provide sophisticated multi-profile set-ups with custom filters based on age ratings.

While this might suggest a fragmented and complex landscape, clear patterns do emerge. These often reflect the type of service, the size of its content library, and its target audience – all of which contribute to different risk profiles in terms of potential harm to audiences. They also help us paint a picture of how APMs are implemented, notable innovations in their application, and how measures are often used together as part of a broader toolkit rather than in isolation.

There is a notable difference in approach between SVoDs and BVoDs

Below we summarise our overview of the APMs offered on the services of those providers to which we sent information requests, which include some of the larger, more well-known SVoDs and BVoDs, as well as other types of service²¹.

We asked providers which specific APMs they use, how these work in practice, whether their approach adheres to any pre-existing standards frameworks, the extent to which the APMs cover the full range of content on their service, what information or communication exists about the APMs for the user, as well as any technical, financial or other considerations in implementing APMs.

²¹ We have not assessed non-UK global providers such as Netflix or Apple TV, as they are currently not in scope of Ofcom regulation.

Global SVoDs

Amazon Prime Video, Disney+, Paramount+. Discovery+, Hayu

Age ratings and classification systems

Though these services all use different age-rating frameworks, they share a common approach: applying detailed age-based classifications to content. These systems vary in format and minimum age thresholds, but all aim to guide audiences in similar ways.

We noted that some ODPS use existing age ratings frameworks and are in formal partnerships with established classification bodies.

Amazon Prime Video has commenced a self-rating partnership with the BBFC²². This allows Amazon Prime Video to apply BBFC age ratings (**U**, **PG**, **12**, **15**, **18**) fully aligned with the <u>BBFC's Classification Guidelines</u> to its Originals and Exclusives content, with long-term plans to achieve widespread coverage of BBFC ratings across the service²³. Currently, content without a BBFC rating is labelled with Amazon Prime Video's own rating system, which uses **All**, **7+**, **13+**, **16+**, **18+**, and which Amazon Prime Video described as broadly mapping to the BBFC age ratings. Ratings are displayed on content thumbnails, landing pages, and in the top-left corner when playback begins. For series, individual episodes are rated, and the highest rating is applied to the series overall. Details of both ratings systems, and how the different labels compare, are available on Amazon Prime Video's 'help' pages²⁴. Amazon Prime Video told us a small percentage of the catalogue is currently unrated. These titles are assigned as 'NR' ('not rated') and are treated as if rated 18 for the purposes of parental controls and to ensure appropriate safeguards.

Disney+ applies ratings that are similar to NICAM's 'kijkwijzer' labels: **0**, **6+**, **9+**, **12+**, **14+**, **16+** and **18+**²⁵. Disney told us its UK age ratings are based on numerous inputs, such as cross-referencing several national ratings regimes – including pre-existing BBFC ratings – as well as its own internal standards and practices. Disney also explained the NICAM system provides an input into its overall ratings decisions. It said this holistic approach provides a clear and robust audience protection framework that is in line with the Disney brand promise. From our own research we found that ratings appear on thumbnails, landing pages, and on playback. For TV shows, we noted the rating typically reflects the overall season and individual episode ratings are not applied. Rating guidelines are available via the services online help centre ²⁶.

Other services use their own rating systems:

Discovery+ informed us it uses its own UK-specific ratings: **UK-U, UK-PG, UK-12, UK-15, and UK-18**. It told us this system is "an adaptation of established broadcast standards ensuring alignment with recognised industry codes". From our own research we observed that ratings appear on thumbnails, landing pages, and on playback. Each episode is rated individually, with the highest rating applied to the series.

²² BBFC and Prime Video announce new self-rating partnership agreement | BBFC, 9 July 2025.

²³ Although currently outside of Ofcom's ODPS regulatory remit, it is of significance that Netflix also have a similar partnership with the BBFC and were the first VoD provider to enter into a self-rating partnership with them. BBFC ratings are applied across the entire Netflix catalogue.

²⁴ Amazon Prime Video help pages on ratings: Prime Video: Help.

²⁵ NICAM is the Netherlands Institute for the Classification of Audiovisual Media. Its <u>Kijkwijzer ratings system</u> provides age ratings and content information for films and television programmes shown in the Netherlands.

²⁶ Disney+ help pages on ratings: Content ratings on Disney+ | Disney+ Help Center | UK.

Paramount+ uses its own labels: **ALL, 9+, 12+, 15+, and 18+**. Paramount told us all content is reviewed by its compliance team to ensure appropriate age ratings are applied. From our own research, we found age ratings are shown on episode thumbnails, and on playback. We noted episodes are rated individually; no overall series rating is provided. Rating guidelines are available via the service's help pages on browser or mobile and are specific to the viewer's region²⁷.

Hayu told us that as it provides content across multiple territories, its compliance process begins in Australia, under the oversight of a UK compliance team. Australian ratings are converted to Hayu's UK ratings – **PG, 12, 15, 18** – echoing the BBFC ratings familiar to UK audiences. Our own research found that individual episodes of TV shows have their own ratings which appear in the episode thumbnails on a series landing page. There is no overall rating for a series. Information about how to use and understand age ratings appears in the 'Support' section of the website²⁸.

Content warnings

Our assessment found that the large global SVoDs use content warnings alongside age ratings. The level of detail and visibility of these warnings varies between services, and we noted they are often less prominent on screen than age ratings.

From our internal research, we observed that **Amazon Prime Video** provides written guidance such as "foul language," "violence," and "flashing images," and does not appear to include modifiers to reflect intensity or severity. Audiences can find these via the 'Details' section on a title's landing page, and on screen when playback begins. For series, the content warnings on playback are episode specific. Amazon Prime Video told us that the content warnings applied to Amazon Originals and Exclusives are BBFC-specific, as part of their partnership. Through our own research, we observed that these warnings, as displayed on the service, are slightly adapted from the BBFC's wording in that they do not include modifiers to indicate intensity or severity of the content.

Through our analysis, we found that **Disney+** also displays warnings on playback and within the 'Details' section of a landing page. These are generally applied at series level, though we observed exceptions of episode specific content warnings on thumbnails. Disney told us visual descriptors are used to highlight prevailing themes or scenes. Examples include: 'mild violence', 'violence', 'mild fear', 'fear', 'coarse language', and 'scenes or themes of a sexual nature'. While some terms such as 'mild' indicate a degree of severity, we observed that the use of modifiers is limited. Disney+ also explained additional content warnings can be applied on screen, or at the start of a programme, if additional audience assurance is required, or at the discretion of the producer, or to flag outdated themes in older content.

Paramount+ told us it uses a "tiered framework" for content warnings which includes specific issue warnings – e.g. 'holocaust theme', and strength indicators – e.g. 'very strong language'. These are displayed whenever the viewer initiates playback and after advertisement breaks.

Discovery+ told us the service itself has no content warnings, though some titles have content warnings and/or information on audience support edited into the start of the programme. The provider stated that this typically applies to sensitive content that has first appeared on linear channels.

Hayu described its content as targeted at an adult audience, as is set out on its <u>Help & Support</u> webpage, and told us that, given its target audience and the nature of its material, content warnings appear on only a small minority of programmes. Where content warnings do appear, they are

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²⁷ Paramount+ help pages on ratings: How Do I Use the Content Ratings.

²⁸ Hayu help pages on ratings: <u>Hayu Help and Support</u>.

presented as a slate²⁹ at the start of a programme. Hayu told us that as programmes usually broadcast first in the US, these are often added by production teams based on US domestic standards, but where deemed appropriate can also be added by the UK compliance team. Additionally, when accessing Hayu via desktop there is a disclaimer at the bottom of the page which says "Hayu content is not suitable for children. Shows may contain scenes of a sexual nature, mild violence, drugs references and strong language - please see content ratings".

In addition to content warnings, **Amazon Prime Video**, **Disney+**, **and Hayu**, all told us that, in some cases and/or where appropriate, they also direct audiences to helplines and support services by adding a slate to programmes. For example, Disney and Hayu referenced 'findahelpline.com' – a website that allows users to find appropriate support in over 130 of different countries.

Parental controls

Our own internal research and user testing found that most of the services in this group offer sophisticated parental controls with a high degree of personalisation. These include the option to use single or various combinations of protections, such as age filters, pin protections and child profiles. Information provided by these services supported our own findings.

Most of these services support multiple user profiles, though the number and customisation options vary:

- **Disney+** allows up to seven profiles. Profiles default to a family-friendly rating threshold (14+) but can be set with individual age-based filters (e.g. 6+, 9+, 12+, etc.) by entering the account password, effectively hiding content above the selected rating. Individual profiles also have other bespoke settings such as a PIN to access or edit the profile, the ability to block not rated and live content, and settings to enable/disable autoplay.
- Amazon Prime Video and Paramount+ support up to six profiles. Both offer PIN-protection
 to access profiles, settings to restrict access to content based on age thresholds, settings to
 enable/disable autoplay, and Amazon Prime Video also offers PIN protection on purchases
 and rentals. On both services, the settings universally apply across all profiles (except child
 profiles).
- Discovery+ supports five profiles, with PIN protection to restrict profile access. Each profile
 can be set with individual age-based filters (e.g. UK-U, UK-PG, UK-12 etc). Autoplay can be
 enabled/disabled.
- Hayu supports one profile per account. By default, a PIN is required to access content for mature/adult audiences. The PIN unlocks such content for four hours or can be disabled altogether through the account settings.

Each service, apart from Hayu, also offers child profiles. This is done via the switch of a toggle during profile setup. However, through user testing, we observed that child profiles on different services carry content aimed at different child age groups:

- **Disney+** offers a 'Junior Mode'. We found this setting gives access to a curated library of content made primarily for children rated 0+ and 6+.
- Amazon Prime Video provides a 'kids' profile'. We observed this offers a curated selection of TV shows and films made primarily for children, as well as 'family friendly' content suitable for ages 12 and under. The age rating of the content provided on the profile is flagged during set up. Purchases, by default, cannot be made from child profiles.

²⁹ A graphic displayed at the start or during a programme to convey information to the viewer.

- Discovery+ offers a 'family profile' where audiences can set a content rating limit (UK-U, UK-PG, UK-12, UK-15), restricting access to content accordingly. We observed that available titles are general audience or family-focused, rather than content made specifically for children.
- Paramount+, we noted, offers two types of child profile, each tailored to different age groups. 'Younger Kids' is suitable for children aged 12 and under, and has a library of content rated 'ALL'. 'Older Kids' is for children aged 13 and up, and has a broader mix of content rated ALL, 9+, and 12+, including titles made primarily for children and family friendly films. The age rating of each profile type is flagged at the point of profile set-up. Account holders can also manage screen time for child profiles. A limit between 30 minutes and 6.5 hours can be set and each child profile can be given individual limits.

Our internal analysis and user testing found that how parental controls work and how settings are applied varies between services.

For example, we noted that on **Disney+** and **Discovery+**, parental controls – such as age rating filters, and profile PINs – are tied to and managed within individual profiles. This means different settings can be applied to each profile by selecting 'Edit Profiles' from the main profile page. In contrast, **Amazon Prime Video** and **Paramount+** apply parental controls at the account level – meaning settings such as PIN protection and age-rating filters work across all profiles and are not tailored to individual viewer profiles.

Our user testing found that on some services the process for applying parental controls is the same across all devices. For example, on **Disney+** we noted the placement of parental control settings on screen, and the steps viewers must take to apply settings, are consistent across mobile devices and browser. On some services, navigating these settings is different depending on device. For example, on **Amazon Prime Video**, when applying settings through the mobile app, viewers navigate to the account holder's profile icon, followed by the settings cog icon, from there they select 'parental controls' and choose from a drop-down menu of control settings. When applying settings through a browser the process is different; viewers navigate to the account holder's profile icon and choose 'account & settings'. From here they must select 'permissions', which takes viewers to a page featuring parental controls including purchase and viewing restrictions.

We observed that once viewers have applied parental controls, settings on all five services generally transfer to devices linked to the same account. Where there are device specific exceptions, we noted this is flagged to viewers. On **Amazon Prime Video**, for example, parental control settings can transfer across most devices apart from Xbox or Fire TV. On these platforms, restrictions must be set on the device. This is communicated to the audience during the setup process.

Age assurance

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Through our analysis, we found these five global SVoD services do not use formal age assurance methods to control access to their content. However, we noted Disney+³⁰, Paramount+³¹ and Discovery+³² all state in their Terms and Conditions that users are required to be at least 18 years old to create an account, and we observed Hayu subscribers must confirm they are over 18 years old

³⁰ <u>Disney+ Subscriber Agreement</u> section 1.1(b) states "Subscribers and Extra Members must be 18 years of age or over".

³¹ Paramount+ Terms of Use section 2.1 states "You must be at least 18 years old to sign-up for an Account and a Subscription.

³² <u>Discovery+ Terms of Use</u> section 2.1 states account holders must "be at least 18 years old, or the legal age of majority in the territory (if over 18)".

during the sign-up process. We noted Amazon Prime Video's Terms of Use³³ say that people under 18 may use the service only with involvement of a parent or guardian. For all these services, account holders must agree to these conditions and provide payment details to complete the sign-up process.

UK PSB VoD services

BBC iPlayer, ITVX, STV Player, Channel 4, 5, S4C Clic

Our internal research looked at this group of ODPS in depth and identified a key distinction from the global SVoDs in terms of age ratings and classification. While those platforms use detailed, age specific rating frameworks, the UK's PSB VoDs rely on a more binary system: the 'G' (for Guidance) label. The exception is S4C Clic, which flags titles that have content warnings with a '!' symbol in a warning triangle.

The 'G' framework was established in 2006 as PSBs' on-demand services began to emerge. The development was led by the BBC and adopted by other UK PSBs, and is generally reflective of scheduling and the 9pm watershed in a linear environment. Through our analysis we noted that **BBC iPlayer**³⁴ and **ITVX**³⁵ explain to audiences via their help pages that the 'G' label is usually applied to content originally broadcast after the watershed – a well-established concept familiar to linear TV audiences – as well as to content that may not be suitable for younger viewers. We also observed that **Channel 4** and **5** take a more nuanced approach and indicate alongside the 'G' rating whether content is suitable for viewers aged 16+ or 18+. (**5** uses a 'G+' symbol to denote 18+ content).

Channel 4 told us this approach is "based on the time-of-day content could appear on linear channels under <u>Section 1 of the Broadcasting Code</u>". For example, content is rated 16+ if it could not be broadcast before the 9pm watershed on linear. Content is rated 18+ if it could not be broadcast before 10pm on linear.

Our research found that all PSB VoDs that use the 'G' label, also use it to flag content that may affect photosensitive viewers, such as flashing images.

Through our analysis of these services, we found that across all PSB providers, the 'G' or '!' label isn't used in isolation³⁶, and is accompanied by additional measures as supporting context. These include:

• Labelling and Content Warnings: We observed that all services pair the 'G' or '!' label with visible content warnings that highlight specific themes or elements requiring viewer discretion. These two measures work hand-in-hand and are typically shown together on the content landing page, and/or as a pop-up message when the programme is selected, and/or as playback begins.

³³ Amazon Prime Video Terms of Use section 1 states "If you are under 18 years of age, or the age of majority in your location, you may use the Service only with involvement of a parent or guardian".

³⁴ <u>BBC iPlayer help pages</u> state "Guidance labels let viewers know when content may be unsuitable for younger audiences (e.g. violence, sex, drug use or strong language) or when it may be harmful to some viewers (e.g. containing flashing images). Guidance labelling is usually used for television programmes that were broadcast after the TV watershed (9pm)".

³⁵ ITVX help pages state "Shows with the 'G' symbol may have been first shown on telly after the 9pm watershed and/or may contain some language, violence, sexual scenes, nudity, adult humour or other material that you may not wish your kids to watch".

³⁶ Our audience research found that participants had limited recall of the 'G for Guidance' label (See Ofcom/Revealing Reality (2025) Understanding perceptions of Audience Protection Measures on Video-On-Demand Platforms (p24 and 29)). This may be attributable to the fact that they viewed it in isolation, whereas in real-world contexts it typically appears alongside other classification elements.

- **Pop-Up Messaging**: When a viewer selects content with a 'G' or '!' rating, we noted many PSB services display a pop-up message that must be acknowledged before playback begins. This reiterates the guidance label and content warning, and may also include:
 - > **Parental control prompts**: We observed ITVX, 5, and STV Player prompt users about PIN protection settings and provide links to activate it.
 - > **Age Assurance**: We noted Channel 4, 5, and S4C Clic ask viewers to self-verify their age (e.g. confirming they are over 16 or 18) before playback begins.
- **Child Profiles**: Our research found that BBC iPlayer, ITVX, and S4C Clic offer child-specific profiles that filter out content with a 'G' rating (or content warnings in the case of S4C Clic) except when the label is used solely to flag photosensitive material.

Parental controls

Through our analysis and user testing, we observed that parental controls on UK PSB VoD services tend to offer fewer features than those on the global SVoDs previously covered. Options for multiple profiles are more limited, as are the tools for restricting access to age-sensitive content.

We found some PSB VoD services support multiple user profiles:

- BBC iPlayer allows one adult profile and multiple child profiles per account. When viewing
 on smart TVs, other account holders can log into the same app and appear as a separate
 profile.
- ITVX supports one adult profile and one child profile.
- **S4C Clic** offers multiple profiles, including child profiles.

From our own internal research, we noted these three services have established children's brands and that their catalogues all feature content made primarily for children. We observed that **BBC iPlayer** in particular has a sizeable offering for both pre-school and older children, via its CBeebies and CBBC brands. The BBC told us its child profiles bring together titles suitable for under-13s including pre-watershed programmes approved by the BBC's Children's Compliance Team. This includes content commissioned for BBC One and BBC Two. It explained that homepage recommendations are automatically tailored to the viewer's age, based on the date of birth, which is gathered during the set-up process, and fall into four age categories: 0-3, 4-6, 7-9, and 10-12.

ITVX allows users to create a 'kids' profile. ITVX told us that "content within this profile is pre-filtered and curated to be age appropriate....". We observed from our own internal research that the content on offer is made primarily for children – a mix of live action and animation – and noted this profile has a separate 'continue watching' list that excludes the content being viewed on the adult profile.

S4C Clic has two children's brands – Cyw (for preschoolers) and Stwnsh (for 6-12 olds). We observed that viewers are able to create child profiles, though we found the profile experience is slightly different to BBC iPlayer and ITVX. Rather than offering a curated experience, all content thumbnails are visible in a child's profile – even those with warnings. However, access to titles with a content warning is automatically blocked. If this content is selected, a pop-up message appears which states it is unsuitable for a child's profile, and the programme will not play.

Our research found both **BBC iPlayer** and **ITVX** allow users to set a profile PIN to prevent children switching between child and adult profiles; on iPlayer this feature is limited to mobile devices. **S4C Clic** does not have profile locks, though we noted that other parental controls can be applied to prevent children accessing unsuitable content via adult profiles.

Through our research we observed that the other PSB VoD with an established children's brand, **5**, does not have traditional viewer profiles, and instead has a dedicated 'Milkshake!' setting for

younger viewers. Viewers are prompted to set up a PIN on entry into the 'Milkshake!' section of the platform. When this PIN is set, upon opening the application, viewers are given an option of entering 'Milkshake!' mode, or the standard '5' experience. The '5' experience includes all 5 content and requires a PIN to enter, but 'Milkshake!' can be accessed without the PIN and includes only children's content.

Through our user testing, we found that all PSB VoD platforms allow audiences to apply PIN protection to 'G' rated or '!' labelled content. This means a PIN must be entered to access the content. Reflecting its slightly more nuanced approach to classification, we noted that Channel 4 offers more flexibility, allowing users to restrict either all content rated 16+ or only 18+ content.

Additionally, we noted **BBC iPlayer** allows users to disable the autoplay feature, giving parents control over continuous viewing.

While we found the global SVoD platforms show nuanced variations in the functionality of their parental control systems, our research shows PSB VoDs tend to have more clear-cut inconsistencies, particularly in how parental control settings behave across devices. The tools offered by PSB VoDs are generally more binary in nature, and the key point of divergence lies in whether parental control settings carry across devices, once applied on a single device.

For instance, we noted on **ITVX**, **5**, and **S4C Clic** users can set parental controls, and though there are some caveats, those settings will automatically carry over to most devices linked to the same account.

In contrast, we found that **BBC iPlayer, Channel 4** and **STV Player**'s parental controls do not transfer with the account and must be set up manually on each individual device. We noted that Channel 4 communicates this limitation during the set-up process, whereas BBC iPlayer and STV Player do not provide this information at set-up, potentially leaving audiences unaware of the need to repeat the process.

Age assurance

Through our internal research, we found that age assurance measures are used more widely by the PSB VoDs than other ODPS, with **Channel 4** and **5** asking audiences to confirm whether they are 16+/18+ before 'G' rated content will play (depending on its classification). **STV Player** asks for confirmation that the viewer is 18+, and **S4C Clic** asks for confirmation that the viewer is 16+.

We observed that age requirements to register for an account on PSB VoD services vary. 5³⁷ and STV Player³⁸ set the bar at 18+. ITVX³⁹, Channel 4⁴⁰, and S4C Clic⁴¹ allow sign-ups from 16+, though Channel 4 told us that on registration, the user's date of birth is gathered to ensure only age-appropriate content is available, meaning that 18+ rated content is blocked if the user is under 18. Our internal research found that BBC iPlayer works differently, and viewers need a BBC account to sign in to iPlayer. Children can sign in with their own BBC account, or they can have a child profile added to iPlayer on a parent's account. Children under 13 need adult consent via a parental verification email to register for their own account, and parent and child accounts can be linked to

³⁷ <u>5 Terms of Use</u> state "Registration is permitted on the bases that: you are 18 years of age or older". In addition, 5 told us the account holders date of birth is collected at registration.

³⁸ STV Players help pages state "You need to be 18 or over to be able to register for STV Player".

³⁹ ITVX Terms of Use state "In order to register for and use the Service, you must be: aged 16 or over".

⁴⁰ <u>Channel 4 Terms and Conditions</u> section 4.2 states "To register a Channel 4 account you must be aged 16 years or older."

⁴¹ <u>S4C Terms and Conditions</u> section 3 states "Those who access and use the S4C Website must be at least 16 years old". It adds that those under 16 must have parental permission to use the service.

manage permissions⁴². BBC iPlayer confirmed to us that child accounts only display iPlayer content suitable for under-13s.

UK commercial BVoD services

Sky On Demand, Now, U, Blaze, Crime+Investigation⁴³

As with UK PSB VoDs, the majority of content on these services has also been commissioned and complied for broadcast on the providers' linear services. Our research and user testing found that some commercial BVoDs take a similar approach to APMs as the PSB VoDs, perhaps unsurprising given ITVX, STV Player, and Channel 4, straddle both categories⁴⁴. Others take approaches more aligned with the global SVoDs, though across all services, APMs appear to reflect the content available and the providers' ties to linear broadcasting. For example, we observed services with more focussed catalogues, often targeting specific audiences, typically offer more limited parental control tools. In contrast, we noted services with broader, more diverse catalogues tend to offer more sophisticated measures.

Age ratings

Our internal research found binary systems are used by some of these services. For example, **U**, which is operated by BBC Studios, uses the 'G' rating system applied by the majority of PSB VoDs, and we noted **Blaze** uses a 'guidance' label to flag titles that carry a content warning.

We observed from our own internal research that **Crime+Investigation ("C+I")** use the ratings **PG**, **12**, **15**, **18**. The provider, Hearst Networks UK, told us that all content on the app is complied and given a linear TV rating. This rating is then mapped to its BBFC equivalent using the matrix below. (Age ratings are included at both series and episodic level, with the highest episode rating applied to the series as a whole).

Table 2: Linear TV and C+I Ratings

Linear TV Ratings	C+I Ratings	
SAT (Suitable All Times)	PG	
POST 21:00	15	
SDNSH (Show Daytime, Not School Holidays)	PG	
POST 20:00	12	
POST 22:00	18	
POST 23:00	18	

Sky informed us that **Sky On Demand**, and the related service **Now**, use the age rating labels **U, PG, 12, 15, 18** – described by Sky as a way of providing "consistency for UK viewers" familiar with these age categories. Sky told us this is an internal rating system and the thresholds for ratings are set by

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⁴² BBC child accounts help pages.

⁴³ This report covers the audience protection measures that Hearst Networks UK applies to its Blaze and Crime+Investigation apps, as opposed to the measures that are applied to these services when they are carried by third-party providers.

⁴⁴ ITVX, STV Player, and Channel 4 all offer ad-free tiers for a monthly subscription.

an internal compliance team. Sky said the standards are driven by the need to comply content with linear broadcast standards.

A caveat is **Sky Store** – which allows audiences to rent or buy films and TV box-sets. Sky told us it has a commercial agreement in place with the BBFC to use its ratings on Sky Store titles, though we observed the official BBFC icons are not used. If a title has not already been given a BBFC classification, it is reviewed in-house using Sky's internal ratings system.

Content Warnings

On the platform **U**, through our own internal research, we noted that content with a 'G' rating is accompanied by simple content warnings such as 'contains strong language' or 'contains mature themes'. U told us these derive from the BBC Studios compliance team and are selected from a predetermined list of warnings. These warnings do not include modifiers to express the strength or frequency of the issues highlighted. Content warnings are found on the content's landing page and when playback starts.

Our internal research found that **Blaze** also applies a content warning to all titles flagged with 'Guidance'. We noted this is a generic warning that states: "Guidance: The following content is unsuitable for children and may contain swearing, violence, adult themes and flashing images". Hearst told us that, where appropriate, the Hearst compliance team can opt to embed a more specific warning within a programme, especially if it considers the generic warning on the app does not cover more nuanced sensitivities. These warnings appear at the start of a programme and occasionally at the start of a part, following an advert break. It also told us some content acquired from third parties already includes an embedded warning at the start of the programme.

Hearst told us **C+I** also provides content warnings, and these are embedded into the start of a programme. It explained that the Hearst Compliance Team applies these content warnings to commissioned titles, though some acquired content already includes embedded warnings.

Our own research found that Sky On Demand and Now also provide content warnings, though they are notably different to other services in that they are audio warnings. Sky told us these are edited as a voice-over slate onto the start of the content, largely replicating how they are delivered on Sky's linear service. Sky described these as bespoke; applied by the internal compliance team with new warnings created as required, including pointing to the severity or frequency of an issue. Sky explained that on occasion, audio warnings may also be accompanied by visual warnings, for example where the warning is included as part of the programme itself. In addition, if titles are deemed to have 'outdated' themes, issues or depictions, this is also flagged with a visual warning. On Sky Cinema titles, content warnings are visual-; on Sky On Demand these are delivered via a slate at the start of the content, accompanied by voice-over. On Now, the same warnings appear in the top left of the screen as playback begins or resumes.

Sky told us it also partners with **Common Sense Media**⁴⁵ to provide viewers with a 'parent's guide' for some content. This guide gives titles a rating from 0-5 against seven themes – language, violence, positive role models, sex, positive messages, consumerism, and drinking, drugs and smoking.

Parental Controls

Through our internal analysis and user testing, we observed that UK commercial BVoD services with a broader range of genres tend to offer parental controls with more features than those with more

⁴⁵ Common Sense Media is a US nonprofit that aims to help parents make informed media choices for children.

focused, genre-specific catalogues that provided simpler activations, or none. For example, **Blaze** and C+I do not feature any parental controls⁴⁶ though autoplay can be enabled/disabled on C+I.

We noted \mathbf{U} has a simple PIN protection feature which restricts access to 'G' rated content. Autoplay can also be enabled/disabled. Parental controls are device specific, and do not carry across with the account between devices.

Sky told us that **Now** allows audiences to create individual profiles, set as 'Kids', 'Teens', or 'Adults'. Each profile can be further customised to block content above a chosen age rating (e.g. Kids profiles can be set to **U**, **U** and **PG**, or **U**, **PG** and **12**. Teen profiles can be set to **U**, **PG** and **12**, or **U**, **PG**, **12** and **15**). Through user-testing we noted viewers can also control profile-specific autoplay settings for episodes and trailers and add PIN restrictions to individual profiles.

Sky On Demand does not support multiple profiles, though Sky told us it has a range of parental control tools that audiences can choose from ⁴⁷. They include:

- PIN protection to restrict access to content based on age ratings;
- a 'family setting' that can be enabled to restrict pre-watershed playback of post-watershed content, restrict purchases, and hide adult content. (These can be applied collectively or separately);
- 'Kid Safe Mode' a PIN-protected setting where only child-appropriate content (rated U and PG) can be accessed; and
- at device level, each Sky Glass TV or Sky Stream puck⁴⁸ in a household can have different parental control settings.

Age assurance

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Through our internal research, we observed these services do not use formal age assurance methods to control access to content. However, we noted **Sky**⁴⁹ and **Now**⁵⁰ require users to be at least 18 years old to enter into a contract. Hearst told us that **C+I** requires account holders to be 18 and **Blaze** requests that under-18s have consent from a parent or guardian to use the platform. U requires users to be 16 to create an account ⁵¹. For all these services, these requirements are stated in terms and conditions, which account holders are required to accept. Sky, Now, and C+I also require payment details.

⁴⁶ Though parental controls aren't available within the Blaze and Crime+Investigation apps themselves, both are available through third party aggregator platforms, such as EETV and Virgin Media, which may provide their own parental controls, like PIN protection, to restrict access.

⁴⁷ As an aggregator, Sky also has parental control settings which allow audiences to PIN protect access to other VoD apps available through the Sky platform (subscription dependant) – such as Netflix, BBC iPlayer, Amazon Prime Video, and Disney+.

 $^{^{48}}$ A Sky Stream puck is a small device that plugs into any TV with a HDMI port and is for watching Sky TV over WiFi.

⁴⁹ Sky's Terms and Conditions state "You can subscribe if you are 18 or over".

⁵⁰ Now's Terms of Use section 2.1 states "Anyone aged 18 or over living in the UK (including the Isle of Man and Channel Islands) can sign up to use Now."

<u>U's Terms and Conditions</u> section 3.3 states "You must be over the age of 16 to create an account with us. If you are under the age of 16 you must have a parent or guardian's permission to use the Digital Services and your parent or guardian should supervise your use of the Digital Services and be the one to register for the Digital Services."

Other types of service

BFI Player UK; Samsung TV Plus; Virgin Media On-Demand and Virgin Media Store; EE TV; Warhammer TV

ODPS have emerged from a variety of origins including linear TV broadcasters and home entertainment providers. They have also developed out of other enterprises such as arts and culture institutions, technology and communications companies, and even hobbies and interest brands. Here we look at six such services and their approach to APMs.

Age ratings

The British Film Institute (BFI)⁵² gives access to its content on a subscription, rental and free basis on the **BFI Player** UK. It told us that its feature films carry BBFC age ratings. Supportive material, such as Q&As and introductions, is unrated, while the BFI applies its own classifications to its historical, national archive material. It added that the vast majority of this mainly silent, archival material requires no guidance, with less than 1% of it carrying a viewer discretion notice and BFI suggested age rating of 15.

Samsung devices, such as smart TVs, give access to **Samsung TV Plus**, which is a Free Ad-Supported Television ("FAST") service that also offers content on-demand. Samsung told us the service uses its own age ratings of **3**, **12**, **15** and **18**, using a purely numerical system so that one system can be used across Europe. To do this, Samsung requires its content suppliers to follow guidelines for aligning its numerical age ratings with the official classification framework of the relevant territory where content is being made available. For the UK, Samsung say providers should refer to the BBFC framework.

Broadband providers **Virgin** and **EE** both provide on-demand services, including TVoD stores for renting and buying movies. Like Sky Store, EE TV, and Virgin Media Store are licensed to use BBFC ratings on their TVoD services⁵³.

Warhammer TV is a service born out of the Warhammer tabletop gaming products for ages 12+, which shows painting videos, playing videos and lore videos, predominantly rated PG or lower, together with related fictional animated shows. Warhammer TV told us that to show content in Australia it has to comply with Australian regulations. It said that therefore its content, with the exception of trailers, is rated by the Australian Classification Board, whose ratings system includes: General (G), Parental Guidance (PG), Mature (M) and Mature Accompanied (MA 15+)⁵⁴. Warhammer TV explained that it edits trailers so that they are suitable for all audiences, adding that in very limited circumstances it makes an additional un-edited trailer with the same rating as the show itself. Ratings are available by clicking 'More Info' on the content landing page and are displayed alongside the synopsis.

Content warnings

The **BFI** informed us that it uses content warnings and guidance text supplied by the BBFC for its feature films, and that BBFC-trained members of staff produce the warnings applied to its other content, as required.

⁵² The BFI is a "cultural charity, a National Lottery funding distributor, and the UK's lead organisation for film and the moving image", the BFI website.

⁵³ Using BBFC Classifications for VOD and Streaming Services (EE TV is listed as BT TV).

⁵⁴ For the full rating system, see What are the ratings?, Australian Government website.

Samsung told us that its service purposefully does not have any content that requires content warnings, but it would consider embedding them if needed.

Virgin Media told us content warnings on its on-demand service and the Virgin Media Store are in line with recognised industry classification frameworks, including the BBFC. And EE TV told us it uses the same content warnings applied under BBFC classification across all certified material.

Warhammer TV told us the vast majority of content on its service is rated PG or lower and does not carry content warnings, but content warnings are applied to some episodes of its animated content. It explained that on playing content, a slate displays the age rating and lists a range of potential themes unsuitable for younger viewers; "This video contains flashing images and content not suitable for younger audiences, which may include violence, nudity, drug use, and adult themes. Viewer discretion is advised".

Parental controls

The BFI informed us that **BFI Player** does not currently provide parental controls (other than password protection on the account), but that it is taking steps to introduce these in due course.

Samsung TV Plus, EE TV and Virgin Media On Demand are aggregators of third-party on-demand services/apps. Those third-party services, if in Ofcom's regulatory remit, must comply with our ODPS Rules and may, if they are the same services assessed in this report, have their own protection measures in place. Virgin Media On Demand told us that it allows customers to restrict access to third-party apps through PIN protection. Samsung gave the example of its Tizen platform, which it also said allows for PIN protection of third-party apps. Samsung TV Plus and EE TV told us they also offer PIN protection to restrict access to content based on the respective age ratings they each use, and EE TV and Virgin Media Store told us they allow purchasing to be PIN protected.

Warhammer TV also informed us it offers PIN protection of content based on age ratings.

Age assurance

BFI Player told us that it places general contractual restrictions on the use of its service, requiring users to be 16 or older, and that account creation and authorisation with a valid debit card is a prerequisite for viewing their feature films. In addition, it said that it asks viewers to accept the age classification of content before age-rated content will play.

An account is not needed to access **Samsung TV Plus**, but it told us that on creating an account, a user must accept terms and conditions which state that the user is 18 years or older, or, if between 13 and 18 years of age, that they must have a parent or guardian's consent to accept them.

EE TV informed us that it asks viewers to confirm their age before age-rated content will play.

Virgin Media Store's terms and conditions also require users to be a certain age: 18 or older⁵⁵.

Warhammer TV told us that it places general contractual restrictions on the use of its services, requiring users to be 13 or older. It added that it also asks for a date of birth during account creation and prompts potential users who are under 13 to provide authorisation to use the service through a separate parent or guardian's account.

Adult ODPS' measures to protect under-18s

As set out in Chapter 2 (under 'defining "Harm" for the purpose of this review'), the ODPS Rules make explicit reference to R18 (pornographic) material - a type of Specially Restricted Material for

⁵⁵ Virgin Media Store Terms and Conditions.

which service providers must take appropriate measures to ensure that under-18s will not see or hear this material. In our Guidance for ODPS providers on measures to protect users from harmful material, we interpret this requirement to mean that there should be in place robust age assurance measures that operate as an age-gate to prevent under-18s from being able to access this material on the service.

The protection measures needed around pornographic material are more stringent and of a higher threshold than this review's consideration of measures that are 'adequate' to assist providers in protecting audiences from harm. Our desk research indicated that the small number of ODPS providers that carry pornographic material on their service all have some form of age assurance in place. However, given the higher risk to under-18s from this material, we will continue to assess these services on an ongoing basis.

4. Our assessment of Audience Protection Measures

Audience insights into On-Demand Audience Protection Measures

One of the principles that guided this review was ensuring it was audience-led, therefore informed by an understanding of UK audience behaviour and attitudes around APMs. To develop a sound evidence base for our assessment of APMs, we commissioned <u>"Understanding perceptions of audience protection measures on Video-on-Demand platforms</u>", a piece of qualitative audience research which is published alongside this report and accompanies our assessment of regulated ODPS' APMs.

Though our statutory review has focused only on ODPS in our regulatory remit, our audience research had a broader focus. This was to reflect the wider range of VoD services available to UK audiences. Throughout, audiences spontaneously discussed and compared the APMs on ODPS that we assessed to other well-known on-demand services and social media platforms for sharing videos that are out of scope of our review.

The objective of this latest research was to specifically explore the attitudes and behaviours of UK audiences around the APMs they encountered in their use of VoD services. This included adults and children with different attitudinal starting points and socio-economic and family profiles. Using APMs as stimulus to elicit and understand audience perceptions, the research did not to seek to evaluate or test one real-world system or tool against another. It also was not focused on the application of content standards on a particular service or services.

"Understanding perceptions of audience protection measures on Video-on-Demand platforms" adds to findings from prior Ofcom research into audience expectations of linear TV and VoD services⁵⁶. These provided a broader context showing how audiences experience and think about content and harms, including their differing expectations of non-linear platforms and streaming services compared to traditional broadcasting environments.

In prior research, audiences expressed a desire for services to provide useful and effective protection measures, and they saw such measures as an important tool to support them in ensuring safer VoD viewing experiences for them and their families ⁵⁷.

Our recent research, in line with previous audience research, has shown that audiences can identify potentially harmful material⁵⁸ and the role of audience protection, particularly to protect children. Audiences noted the risk of accidentally or inadvertently coming across harmful or offensive material was reduced compared to linear TV, as VoD viewers' have increased agency and choice⁵⁹. Audiences also noted that they were more likely to be able to access riskier content when watching

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⁵⁶ IPSOS/Ofcom (2023) Exploring Audience Expectations of Linear and On Demand Services.

⁵⁷ Ibid. (p38)

⁵⁸ Ofcom/Revealing Reality (2025) Understanding perceptions of Audience Protection Measures on Video-On-Demand platforms (p13); IPSOS/Ofcom Exploring Audience Expectations of Linear and On Demand Services (p23).

⁵⁹ IPSOS/Ofcom Exploring Audience Expectations of Linear and On Demand Services (p24).

certain VoD services, as those services are not bound by appropriate scheduling or pre- and post-watershed rules⁶⁰.

Audiences also tend to be familiar with APMs and able to talk fluently about how they work, and how they could be used to inform decision-making, both when talking about individual APMs specifically and regulatory tools more generally⁶¹.

Overarching audience views

Broadly according to the participants of our latest audience research:

- APMs are recognised and valued on VoD: audiences were able to recall seeing and using a range of protection measures on VoD services, with parents of young children in particular valuing the ability to determine what was appropriate for their families to watch.
- APMs should be tailored and not cause viewer friction: audiences valued the ability to
 manage controls for different family members (e.g. younger and older children) but thought
 it was important that protection measures didn't make accessing content more difficult.
- Better information and uniformity of APMs is needed across VoD: Audiences thought APMs would be easier to use and understand if the same types were used across VoD services.
 Though there wasn't a clear preference for a particular APM or regime, audiences favoured APMs that offered clear and detailed information.
- VoD is generally considered to be safer, relative to social media: audiences compared their
 viewing experiences on VoD to that on social media and felt that in comparison, it was a
 safer viewing experience. They generally regarded the content on VoD services to be
 professionally commissioned, produced and curated and associated this with less risk of
 harm.
- APMs should be proportionate to the risk of harm: audiences felt that stricter measures, such as age verification methods, would be disproportionate for mainstream VoD services. However, they acknowledged they were appropriate for some services, e.g. adult services featuring pornographic material.

Our view on the use of APMs by ODPS providers

In this chapter, we draw out key reflections from our findings (reported in Chapter 3). They offer observations and examples of APMs in practice and highlight different approaches to protecting audiences from harm. These considerations are for the purpose of offering a broad assessment of what adequate APMs look like on on-demand services, based on our review and current understanding, and informed by the contextual insight provided by our audience research.

We are encouraged that many Ofcom-regulated ODPS providers in the UK are currently deploying audience protection measures such as age ratings, content warnings and parental controls on their

⁶¹Ofcom/Revealing Reality (2025) Understanding perceptions of Audience Protection Measures on Video-On-Demand platforms (p4); IPSOS/Ofcom Exploring Audience Expectations of Linear and On Demand Services (p38-41).

⁶⁰ Ofcom/Revealing Reality (2025) Understanding perceptions of Audience Protection Measures on Video-On-Demand platforms (p16); IPSOS/Ofcom Exploring Audience Expectations of Linear and On Demand Services (p19).

services to protect audiences from harm, and in ways which we considered broadly adequate to assist them to protect audiences from harm.

Age ratings and classification systems

Approaches differ across the sector

We observed that a number of the services we assessed carry age ratings or classifications systems that are in alignment with, or underpinned by, age-appropriateness standards rooted in the BBFC's statutory classification framework⁶². **Amazon Prime Video** for example is a service that has trialled and adopted a self-rating classification partnership with the BBFC to reflect UK audience-informed content standards in the labelling of its Originals and Exclusives content. Our audience research found that participants showed familiarity around the labelling associated with the BBFC and told us that the BBFC ratings had perceived gravitas and trustworthiness⁶³. Some were also concerned as to whether age ratings – particularly on services they perceived to be from other countries – were reflective of UK standards and cultural sensitivities⁶⁴.

Our own internal research and international stakeholder engagement has shown that non-UK standards frameworks around harm, offence and the protection of children are shaped by cultural and societal attitudes that may be different to UK audience expectations and, in some cases, to Ofcom's broadcasting and ODPS standards⁶⁵. Localisation and adaptability of standards and classification approach is therefore particularly important for the measure to be adequate to protect audiences from harm.

Where services based their classification on standards frameworks from other countries we provide key reflections, including examples we observed where there had been adaptation to meet UK audience expectations.

For example, **Disney+**, use a ratings system that takes into consideration numerous inputs, including the Dutch NICAM/Kijkwijzer framework⁶⁶. However, its approach takes account of the UK ratings for works that may already be classified by the BBFC, and is localised to reflect UK audiences' cultural sensitivities and expectations.

The age ratings and classification approach taken by **UK PSB VoDs** such as BBC iPlayer, ITVX, Channel 4, Channel 5, and STV Player is uniquely different and tied to the legacy of UK linear broadcasting compliance approaches and the traditional 9pm watershed. The 'G' (for Guidance) label is rooted in a largely binary understanding of content as pre- or post- watershed, with post-watershed not

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ODPS Guidance section 5.31 states that "An ODPS may rely on an existing age ratings framework such as the BBFC ratings system. We expect providers who choose to use existing, established age ratings frameworks on their platforms to also ensure that this is done with the knowledge of the relevant ratings body. This is to promote consistency of established ratings standards, as well as to protect users who will rely on the accuracy of ratings information provided to them by the ODPS".

⁶³ Ofcom/Revealing Reality (2025) Understanding perceptions of Audience Protection Measures on Video-On-Demand Platforms (p25).

⁶⁴ Ibid. (pp26-27).

⁶⁵ By way of example, under the Dutch ratings framework, offensive language that isn't sexualised or discriminatory in nature, would not on its own alter the age rating of content. This is a marked difference to the UK approach to broadcasting, film and on-demand content standards when it comes to protecting children from the use of on-screen offensive language.

⁶⁶ In our audience research findings, the use of a more granular, age-specific labelling system such as the Dutch ratings was preferred by some participants for its clarity for consumers and its nuance when it comes to understanding age developmental stages around content suitability.

suitable for children. Channel 4 and Channel 5 have slightly more nuanced systems where they categorise and label content suitable for those aged 16+ and 18+.

Although some of our audience research participants felt this letter-based labelling approach was confusing and less informative than age-based classification systems, ⁶⁷ we are mindful that these services are different from the global SVoDs in that most of their content, where it is carried on their linear TV services, is already subject to the Ofcom Broadcasting Code. The BBC iPlayer content is subject to the Broadcasting Code rules for linear TV and radio services. Other PSB ODPS will be subject to enhanced standards regulation under the new Tier 1 Code. This will include ODPS that are used by a PSB to fulfil their public service remit.

We also acknowledge the 'G' label is not applied in isolation and is typically used alongside content warnings and other signposting. Given the unique nature of BVoD services as a form of catch-up or alternative space for viewing UK content, we also consider there is potentially less risk posed to audiences by these services than there might be for services carrying much wider catalogues (such as services with a greater proportion of content that has not already been complied for UK linear broadcast, which may be less familiar to UK audiences than 'catch-up' programmes).

In our October 2023 research, Exploring Audience Expectations of Linear and On Demand Services, audiences told us that they had similar expectations of linear TV and BVoD services, while SVoD services were considered distinct from them both. BVoD services were generally perceived as an extension of their associated linear channels and were seen to offer similar content. While acknowledging that these services were both for catching up on TV content and for discovering new original content, SVoD services were still considered distinct from linear TV and BVOD services and more likely to offer 'edgier' content. Our latest research confirmed some audiences still share this perception⁶⁸. These findings reinforce the point that one size does not fit all for the fluid and fragmented VoD services landscape at present; the different approaches taken by services have their own specific global or regional context or national broadcasting legacy to consider, and we anticipate these approaches will evolve over time with changing viewing habits and technology.

Explanations around the chosen approach to age ratings or classification could be better

Our audience research also revealed that viewers are unsure about where age ratings come from, especially on global SVoD services which are often perceived as 'American'. Participants questioned whether the ratings they saw were meant for US audiences or specifically tailored for the UK, even on services where official BBFC age rating labels are used ⁶⁹. In reality, none of the services we assessed use American ratings, and all the global SVoD providers who responded to our request for information told us their ratings systems apply specifically to UK audiences. However, given the international nature of some providers and the range of rating systems used across different ondemand services, some confusion is perhaps understandable.

Our findings suggest that audiences' trust and understanding of age ratings and content warnings can be supported by providing clear and findable explanations of the framework or approach being used.

⁶⁷ Ofcom/Revealing Reality (2025) Understanding perceptions of Audience Protection Measures on Video-On-Demand Platforms (p29).

⁶⁸ Ibid. (p16).

⁶⁹ Ofcom/Revealing Reality (2025) Understanding perceptions of Audience Protection Measures on Video-On-Demand Platforms (pp26-27).

Where services apply their own internal ratings systems and symbols, it is particularly important that the underlying reasoning behind labelling decisions is made transparent to viewers, as set out in Ofcom's ODPS Guidance, 70 as part of the ODPS framework. This helps audiences make informed choices and understand the rationale behind the ratings they see.

For example, global SVoD service **Paramount+** provides clear guidance on its age ratings. There is a direct link – labelled 'ratings guidelines' – from the homepage, making it easy for viewers to find the information they need.

These pages clearly state that the ratings are for UK audiences, break down what each label means, and explain what viewers can expect from content with each rating. They also cover content warnings, helping audiences understand why a warning might be used, and what content they might expect to encounter after reading it.

⁷⁰ Paragraph 5.30 "Where ODPS providers are using their own framework for making rating decisions, the overall basis on which these decisions are made should be made clear to viewers".

Figure 1: Paramount+ information page about age ratings and content warning labels



GO BACK HOME

CUSTOMER TUTORIAL

How Do I Use the Content Ratings

Ratings guidelines are specific to the region that you are accessing Paramount+ from so please ensure you have selected the correct native language above to see the information correct to your region.

It's easy to be sure what you're watching will be appropriate for you and your family. Ratings are provided in a few ways throughout our service, including an icon or text that appears when content begins

Locally, the following guidelines are used to assign a program's content rating and content descriptors.For Australia and other region Content Ratings, please scroll down.

The following content ratings are used in the UK & Ireland:

Maturity Content Level Rating		More Details				
Young Kids	ALL	0+ is specifically designed for a very young audience, including ages 0 to 7+. Contains little or no violence. There will be no coarse language and no sexual dialogue or situations. There may be mild peril with immediate light relief. Please note that some content may contain flashing images for which in-programme advisories are given.				
Older Kids	9+, 12+	May be unsuitable for children under 9 and generally a bit more adult guidance is recommended in this category. Content may contain mild fantasy & comedic violence that does not dwell on any detail. It may contain some suggestive dialogue, infrequent coarse language, mild sexual references and may feature drugs, smoking and alcohol consumption in a limited way. Children viewing content in this category would generally have a good understanding around safety and a general knowledge of the world around them. Please note that some content may contain flashing images for which inprogramme advisories are given.				
Teens	15+	Generally unsuitable for children under 15. May contain intensely suggestive dialogue, moderate to strong language and moderate to strong violence. Content in this category may include moderate to strong sexual references and may also explore themes of alcohol and substance use and abuse. Themes are generally mature. Please note that some content may contain flashing images for which inprogramme advisories are given.				
Adults	18+	Generally unsuitable for anyone under 18 and the use of the available pin is recommended. The content may contain crude and indecent language, explicit sexual activity and references and prolonged graphic violence. Themes are generally adult in nature throughout. Please note that some content may contain flashing images for which in-programme advisories are given.				

UK Content Labels: The content rating may be accompanied by content labels that give more information about the content and will grade issues like language, violence and sexual content. They will also alert Paramount+ users of triggering topics such as emotional intense scenes, images of war and animal cruelty. We will include alerts to any content that no longer meets today's attitudes and cultural norms and thus may cause offence. Flashing images which may be a problem for sufferers of photosensitive epilepsy are also highlighted on in-

We observed that most PSB VoDs include information about ratings on their 'Help' pages. We considered that such steps could help address the audience uncertainty found in our audience research about how content is labelled and the source or system underpinning any labels. We noted that both **BBC iPlayer** and **ITVX** explain how their ratings relate to the watershed and traditional linear TV scheduling – grounding the label in concepts that are widely understood and recognised by audiences. However, while these explanations are clear and helpful, audiences have to seek out this information for themselves. We observed that **5** has taken an extra step to make this information more accessible by linking to it via a 'pop up' when a viewer selects a 'G' rated title. This practice makes APMs easy to use and engage with.

Key reflections on age ratings

- Clear information about the ratings framework used and how ratings are applied helps audiences make properly informed viewing choices.
- Offering easy-to-spot signposting to this information, for example, at the point when viewers are deciding what to watch, makes it quicker and easier for audiences to find.

Content warnings

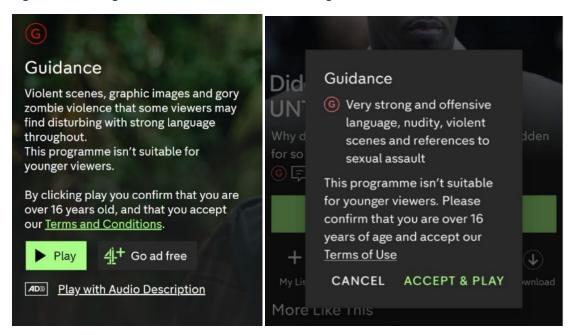
Content warnings should be clearly displayed and provide appropriate and specific detail

Detailed content warnings can help viewers make informed choices, and viewers want warnings to be specific, accurate and easy to understand ⁷¹. We observed examples of this across several ODPS providers offering viewers or subscribers helpful and informative content warnings.

For example, we observed that **Channel 4's** are specific and easy to understand. Their warnings highlight key themes and issues in detail, they indicate the severity and frequency (including if an issue is present from the very start), and flag older content that may contain outdated themes.

⁷¹ Ofcom/Revealing Reality (2025) Understanding perceptions of Audience Protection Measures on Video-on-Demand platforms (p5).

Figure 2.1 and Figure 2.2: Channel 4 content warnings as shown on user interface



These examples also illustrate why the choice of language in content warnings is important. For example, when warning viewers about offensive language, we observed that some services use terms like 'foul language' or 'coarse language'. These phrases could be considered vague, somewhat outdated, and open to interpretation, and our audience research⁷² showed participants found 'non-specific' thematic warnings like this unhelpful. Conversely, using plain and direct terms, such as 'contains swearing' or 'contains offensive derogatory language', is less ambiguous, more meaningful, and better meets current audience expectations.

Through our research, we observed that content warnings (and age ratings) for TV series, on some services, are only applied at the season or series level. In these cases, the warnings are necessarily broad and therefore do not highlight specific themes or issues that may arise in individual episodes. However, in this area we also observed some services providing content warnings and age ratings at the episode level (e.g. Now), while still applying the highest episode rating as a general marker for the series. This granular approach offers more precise information about what audiences can expect. In our research some audiences felt less precise information was generally unhelpful when making viewing decisions.

Some audiences also noted that generic or series-wide ratings (i.e. ratings which refer to all the episodes of a series or season and only cite the strongest classification issues, or warnings that just say material is unsuitable) could leave viewers, and particularly children or more vulnerable viewers, open to more risk if they do not have enough detail to make decisions that suit their needs.

Some services offer support resources for viewers affected by what they have watched – a practice shown to be noticed and valued by viewers⁷³. We observed examples of global SVoDs pointing to websites that provide support service details across multiple territories, with a slate at the start or end of certain programmes. We also saw UK PSB VoDs, in our survey of regulated ODPS, pointing to more localised services in the same way.

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⁷² Ibid. (pp34-37).

⁷³ Ibid. (p5).

We also noted examples of providers making this information available by placing it on the contents landing page; this worked as a direct link when viewed via mobile or browser, again potentially making signposted information more accessible.

Key reflections on content warnings

- Specific warnings that provide enough detail empower audiences to make informed decisions. This can include helping them understand the themes, issues, severity, and frequency of potentially harmful content or offering them episode-by-episode information.
- Accurate descriptions of content, expressed in concise, relevant and accessible language are useful for audiences.
- General warnings such as phrases which refer generally to content being unsuitable – are less meaningful and helpful.
- Prominent and clearly visible content warnings are easier to find and use. For
 example, when placed prominently, e.g. on landing pages or at the start of a
 programme, they can complement other relevant information, e.g. age ratings.
 Content warnings can be reinforced, such as reappearing when playback
 begins/resumes, or by using pop ups, or even providing audio alerts.

Age ratings with content warnings

We observed that age ratings and content warnings are most effective when available and used together.

Age ratings can signal the strength and intensity of certain content levels, while content warnings offer contextual information, helping viewers understand why a particular rating has been applied. This combination empowers audiences to make informed choices when selecting suitable viewing for themselves or their families – particularly when this combined information is made available early in the viewing journey. Our audience research supported this, and participants told us how they use this combination of information to inform their decision making ⁷⁴.

Our internal research showed that some ODPS do display both measures and, in some cases, place them prominently and close together on screen.

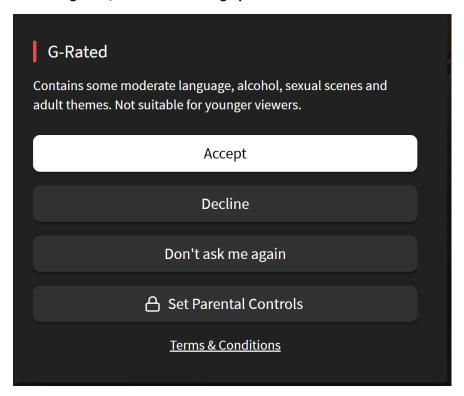
On the global SVoD services, age ratings are typically visible early in the viewing journey, such as on thumbnails or landing pages. Content warnings tend to appear slightly later, found either by clicking 'details' on the landing page, or appearing on playback.

PSB VoDs generally go a step further – perhaps to support their more binary 'G' rating system. They typically display the 'G' rating and any relevant content warnings side-by-side on the content landing page, and/or once the content has been selected via a pop-up. This reinforces the information and, in some instances, includes additional details about other protection measures. For example, **STV Player** provides a pop-up that includes a rating and content warning, as well as a prompt to set parental controls.

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⁷⁴ Ibid. (p20).

Figure 3: STV 'pop up' message when selecting 'G' rated content, with rating and content warning shown together, and other viewing options



Key reflections on age ratings and content warnings together

- Using a combination of ratings and content warnings together, where
 proportionate and practicable, aids audiences in making informed viewing
 decisions and aligns with their expectations and prior knowledge about APMs.
- Content warnings and age ratings displayed clearly, together, and preferably early enough to inform viewers as they choose what to watch, is an effective way to provide useful information.
- These APMs can be reinforced. Sharing age ratings and content warnings on playback, via pop-ups, through overlays or slates, and/or when playback is resumed, or after ad-breaks, can be helpful ways to repeat key information.
- Additional context is provided by content warnings indicating not just what the age rating or restriction is, but why it has been applied.

Parental controls/PINs

Controls and age-specific filters are valued by viewers, particularly those with parental responsibility

Our findings in the previous chapter show that parental controls vary more between services than any other APM. They range from straightforward, account-wide PIN protections to sophisticated systems with multiple user profiles, each with their own personalised age filters and nuanced settings.

What is appropriate and proportionate will depend on the nature of the service, the breadth and potential risk of harm posed by content in its catalogue, and the diversity (and age) of its audience. Services offering large catalogues of mainstream material alongside children's content may require more advanced controls than those with niche or more focused interest-based content e.g. sports or news services with limited child appeal or likely child audience.

The variation in and proliferation of different parental controls across different platforms and services can lead to confusion for viewers, and parents said simple set-ups were preferable⁷⁵. Clearly and accessibly communicating how parental controls work and what options are available to viewers could reduce confusion.

Signposting for parental controls and clear information about use and set up is helpful for audiences

We observed that most major ODPS (global SVoDs and BVoDs) that have parental controls provide 'Help' pages on their websites explaining to their audiences or subscribers how to use them. However, we observed differences in user pathways, including examples where our user testing showed viewers had to seek out this information themselves, which requires a certain level of media literacy and self-efficacy.

We noted some services make these resources more accessible, clearly signposting the way to find parental control settings and user support during the viewing journey. This potentially reduces the time and effort required for audiences (and parents or carers in particular) to locate and set the tools and further (sometimes essential) guidance and technical information.

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⁷⁵ Ibid. (pp48-49).

Our research found examples of services that actively remind viewers that parental controls are available, whether or not they are currently in use, and explain how to set them up, during the viewing journey. We observed that BVoDs, in particular, frequently prompt users with 'pop-ups' and alerts about parental controls when a piece of content that may not be suitable for younger viewers is selected.

Figure 4: ITVX 'pop up' message when selecting G rated content with a warning about parental control status and signposting to parental control settings



Other services use the profile homepage as the default landing page when launching the service. This approach highlights profiles as a method of parental control, giving audiences an immediate visual reminder that profiles are available on that service. It can also nudge viewers to manage settings or to develop their understanding through 'learn more' options, offering clear guidance. Examples of services using this approach include Disney+ and Amazon Prime Video below.

Figure 5: Amazon Prime Video landing page, with profiles and signposting to settings and information

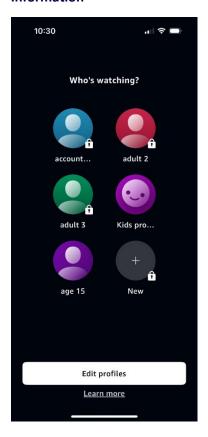
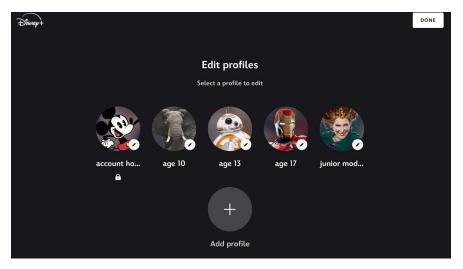


Figure 6: Disney+ landing page with profiles and signposting to edit profile settings



Child profiles can offer parents welcome control but may need flexibility to avoid over-restriction

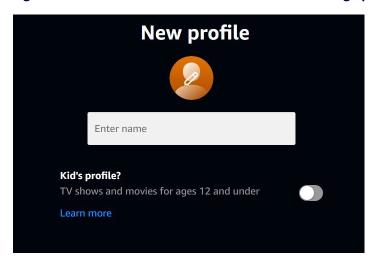
Our audience research found that child profiles can offer a safe and curated viewing experience for younger audiences, providing a simple way for parents and carers to control access to ageappropriate content. They can be a valuable tool for parents and carers. However, some parents voiced concerns about restricted child profiles being too limited. Others reported that children

found the content aimed at them too young or unappealing, leading them to seek access to adult profiles instead ⁷⁶.

Through our internal research, we observed some examples where services communicate the age range and type of content included in child profiles at the point of setup. We considered this approach could be useful in helping audiences decide if the profile on offer is suitable for their specific child.

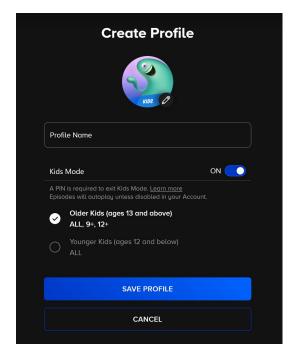
For example, **Amazon Prime Video** provides guidance on age suitability during profile creation as well as links to further information, helping parents understand what the child profile includes:

Figure 7: Amazon Prime Video user interface for setting up a profile



Paramount+ allows users to choose between profiles for 'younger kids' and 'older kids,' so not only making the age-appropriateness of the profile clear but also making it easy to tailor the experience to a child's maturity level.

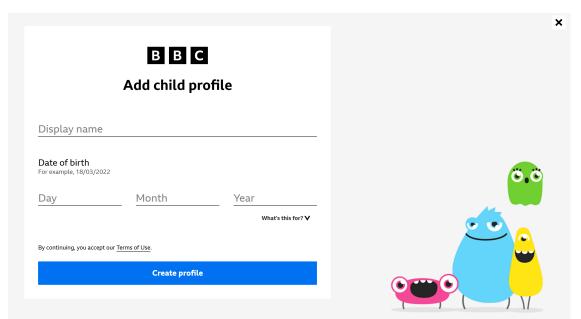
Figure 8: Paramount+ user interface to create a profile



⁷⁶ Ibid. (pp43, 46-47).

BBC iPlayer takes a dynamic approach with child profiles and tailored homepage recommendations based on the child's age (their date of birth is collected when the profile is created). The content available blends children's programming with family-friendly mainstream content, e.g. CBBC, Strictly Come Dancing, and Doctor Who. This type of approach could address parental concerns, ensuring that recommendations are appropriate and appealing - based on their child's age - while also not sacrificing viewing choice for over-restriction as it acknowledges that young audiences often enjoy content beyond traditional children's genres.

Figure 9: BBC iPlayer user interface to add a new child profile



Failsafes and default protections provide a counterbalance to audience fatigue

Research showed some audience fatigue and confusion including from too many steps in the setup process and from controls differing between devices⁷⁷, leading to users skipping controls during setup (with the intention of returning to them later), or ignoring them all together. We found that several services mitigated risks associated with this with **built-in** safeguards, which work if parental controls are not actively set up, or to support parents in managing these tools more easily.

For example, we noted that **Disney+** applies a default 14+ content rating limit to any newly created profile (except for 'Junior Mode' child profiles). This rating can be changed at any time, but account holders must actively 'opt in' to an adult '18+' profile that has access to the full catalogue. This can only be done with the account password, adding a layer of security. (The ad-supported tier takes a slightly different approach⁷⁸). We also observed Disney+ allows account holders to apply password protection to profile creation, helping prevent children from bypassing controls by creating new profiles. It also offers a 'kid-proof exit' feature to junior mode profiles.

Sky informed us that on **Sky On Demand**, the 'family setting' is automatically applied for new customers. This restricts on-demand access to post-watershed content before 9pm and blocks purchases, offering a default level of protection.

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⁷⁷ Ibid. (p49).

⁷⁸ For viewers with an ad-supported subscription, the profile owner's date of birth is required. This ensures only appropriate adverts are served. Additionally, it also triggers a default content rating limit based on the viewer's age. As with a standard subscription, any changes to this setting can only be made using the account password.

Sky's 'Kid Safe Mode' setting, which limits content to TV and movies with a U rating (so suitable for children) also has a safeguard: this mode remains active during power cuts and if viewers restart the box.

Tools that do not work across different devices cause potential confusion

We are aware that audiences access VoD content and services via a wide range of devices – smart TVs, mobiles, tablets, browsers – and often different viewers access content in multiple ways within a household. On the ODPS we explored, we found that depending on the platform, **parental control settings do not always transfer automatically between devices**. For example, PIN protection set up on a browser may not apply when accessing the same account via a smart TV or mobile app. These inconsistencies can lead to confusion, frustration, and a lack of trust⁷⁹.

If parental control settings do not transfer across devices as part of the account set-up, clear communication is helpful to make audiences aware of any limitations, where settings may need to be reapplied, and how they can continue to protect themselves and others, especially children, from being exposed to potentially harmful content.

We found that some ODPS had incorporated practices designed to mitigate the risks of parental control settings not transferring across devices. **Channel 4**, for example, does not transfer parental control settings between devices, but clearly informs users of this limitation when controls are being set.

On **Amazon Prime Video**, while parental controls do not transfer to certain devices – in this case, Xbox or Fire devices – this is communicated to users during set up. Additionally, account holders can choose which other devices the parental controls apply to. So, for example, parents can exclude their own personal devices while securing those devices used by children, such as the family smart TV or a child's tablet.

Key reflections on parental controls

- Parental controls are most effective when they are easy to find and set up, clearly signposted, and integrated into the viewing journey.
- Likewise, intuitive user interfaces especially those that explain more complex aspects of setting up parental controls can empower audiences and may reduce fatigue or non-completion.
- Clear labelling on child profiles highlighting content type and age suitability helps parents assess whether a profile matches their child's maturity, or if alternative profiles and restrictions may be more suitable.
- Default protections such as automatic safeguards might support audiences.
- Consistent parental controls across devices help parents navigate VoD services, and where that is not possible, accessible explanations also help users make the most of available protections in line with their needs.

Information for consumers such as FAQ pages is varied and not always easy to find

Audiences are keen for proportionate APMs that help them navigate material to protect children from harm. However, they do not always know what APMs are available, where they are from, or

⁷⁹ Ofcom/Revealing Reality (2025) Understanding perceptions of Audience Protection Measures on Video-on-Demand platforms (p49).

how to implement them, and can identify concerns and limitations which impact their confidence and trust⁸⁰.

We found that most ODPS in our review already provide 'Help' pages with information about parental controls and other safeguards. These are typically hosted on the service's website, with direct links provided when viewing on mobile devices, and QR codes or web addresses when viewing on smart TVs. We noted some services point users to these Help pages with prompts at strategic points during the viewer journey.

Through our analysis and user testing, we observed the level of detail and ease of use varies significantly across services. While many Help pages include a search function, this often relies on users knowing the right terms, e.g. "parental controls" – to find relevant guidance. Some of the search tools that we assessed in our review were more consistent or effective than others.

Help pages often have to present large amounts of (sometimes technical) information in a clear, user-friendly way. We observed several examples of Help pages across different services and types of APM which achieved this in practice. The **BBC iPlayer's** Help pages were observed to be well-integrated and visually connected with the overall viewing experience, using clear, easy-to-understand categories and language to help users navigate the information. We also observed that some services, for example **Sky**, include short 'how-to' videos – an accessible format that may be more helpful for some viewers than text alone.

We noted that when viewing via smart TV, some services offer audiences QR codes to make accessing Help pages on their mobile device more straightforward, and **Channel 4** is an example of a service that embeds FAQs and viewer support directly into its Smart TV offering so users do not need to switch devices to access help.

Such approaches remove potential barriers to implementing parental controls and potentially improve accessibility of APMs.

Key reflections on providing information to viewers

- Clear signposting and prominent links from the platform to the 'Help' pages make them easy to find.
- 'Help' pages which include information on APMs including how to set up and maximise the impact of parental controls are more valuable when easier to navigate and use.
- Clear information with simple language, and audience-friendly and accessible layouts, can help consumers understand and effectively use APMs.

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⁸⁰ Ibid. (pp3-5, and p26).

5. Next steps

APM review and changes to on-demand regulation

Beyond the ODPS providers cited in this review, we have consulted and engaged with a range of stakeholders including other regulators, classification bodies, and tech solution providers – to ensure there is coherence and clear communication around Ofcom's regulation of on-demand services.

We regard engagement with industry and wider stakeholders to be a key component to our work in this space, particularly as we will be consulting on and implementing a new standards Code for "Tier 1 services" in 2026.

As the statutory duty to review audience protection measures extends to this new subset of non-UK ODPS providers with services that will become Tier 1, we will carry out a further review on the APMs of those services, once we know which non-UK ODPS are to be regulated as Tier 1 services.

A1.The UK VoD Landscape

A wide and diverse range of VoD services in the UK

To better understand the adequacy of APMs in fulfilling the requirements placed on regulated ODPS providers, we supplemented our review with a general appraisal of the UK VoD landscape and the place of regulated ODPS providers in the wider VoD ecosystem.

The UK VoD market⁸¹ is largely mature and well developed. There are **over 400 major VoD services available in the UK, of which more than 200 are ODPS**. Nevertheless, it remains dynamic, and new services launch (and close) most weeks⁸². It has developed out of a complex media ecosystem and ranges from large, US studio-backed direct-to-consumer services (e.g. Disney+) and DVD-to-streaming innovators (e.g. Netflix), offering audiences a mix of genres, to genre-specific players both large (e.g. Crunchyroll) and small (e.g. Warhammer TV). The same VoD banner also encompasses the catch-up services from established broadcasters in the UK (e.g. Sky On Demand and BBC iPlayer), special interest/small audience services and new US entrants such as Tubi (launched in the UK in 2024).

The UK also has a number of adult pornographic services which require robust access controls to protect under-18s⁸³.

The different models of VoD services

Traditionally the VoD services available to UK audiences have been categorised by business/revenue model:

BVoD	SVoD	TVoD	AVoD
Created by incumbent broadcasters (e.g. BBC, Sky). Typically, free or adfunded. Often used as a catchup or catalogue repository for linear broadcaster content. This is changing as broadcasters move to a streaming-first strategy.	Provided to UK audiences via a monthly or annual subscription. Accessed directly or via a third-party.	Offer individual pieces of content to buy or rent on a one-off basis.	Provided to UK audiences for free and are funded by advertising. Many are hybrid in that their on-demand offering sits alongside FAST (Free adsupported streaming television) channels.

⁸¹ For further information, see our Media Nations Report- UK 2025, p. 56.

⁸² For example, Warner Brother Discovery is planning to launch HBO Max in the UK in early 2026. See <u>Sky UK & Ireland and Warner Bros. Discovery announce new distribution and bundle agreement</u>, Sky, 9 December 2024.

⁸³ Paragraph 5.20 of Ofcom's On-Demand Programme Services (ODPS) Guidance.

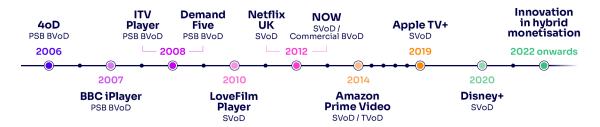
BVoD services subdivide. Some are free, through the prior purchase of a television licence (e.g. the BBC iPlayer) others through advertising (e.g. Channel 4, ITVX and U), and some require a subscription (e.g. Sky and ITVX premium).

These service models offer audiences:

- catch up on broadcast programmes, from established television broadcasters (via BVoD platforms such as the BBC, Channel 4 or Sky), or to access streamed, ad-supported channels from newer entrants (via FAST/AVoD services such as Pluto TV, Rakuten TV or Samsung TV Plus);
- unlimited access to content catalogues through a monthly subscription (SVoD services, such as Netflix, Disney+ or Prime Video) or for free with adverts (AVoD services, such as Tubi);
- the choice to buy or rent an individual item of content (TVoD services such as Virgin Media Store and EE TV); and
- access to specialist content, e.g. cinema, theatre, sports content, and content focused on sports teams, hobbies, interests, views and beliefs.

Figure 10, Timeline of VoD Services in the UK, shows the lines between BVoD, SVoD, TVoD and AVoD have and are blurring over time as VoD services modify with hybrid approaches that maximise revenue and increase flexibility for consumers. Some SVoD services which initially offered only adfree subscriptions now offer ad-supported lower cost subscription tiers, while some BVoD services which originally only offered free, ad-supported catch-up services, now let audiences remove adverts and access additional content by paying a premium subscription. Other diversifications include offering paid-for content alongside a subscription service, letting audiences pay to enhance content, or offering aggregated viewing environments and content sharing partnerships (such as Disney+ and ITVX's venture announced in July 2025).

Figure 10: Timeline of VoD services in the UK



2006 - 4oD (PSB VoD)

Channel 4 is the first UK PSB broadcaster to launch an on-demand service. 4oD (4 on Demand) arrives as a pay-per-view service (99p - £1.99 per rental) and offers 'catch-up TV' where audiences can 'rent' programmes for up to 30 days after the linear TV broadcast, as well as access an archive of Channel 4 'classics'. The model later switches to a free, ad-supported service. It expands and rebrands as 'All 4' in 2015, and again as 'Channel 4' in 2023, becoming the first UK broadcaster to unify its digital and linear services under one brand.

2007 - BBC iPlayer (PSB VoD)

The BBC launches 'BBC iPlayer'. A free BVoD service from the start, it offers 'catch-up TV' initially allowing audiences access to content for up to seven days after linear transmission. The user-friendly platform, accompanied by strong promotion on linear TV with the tagline 'making the unmissable, unmissable', helps the service reach mainstream audiences, arguably paving the way for other VoD services. Its first major update in 2008 sees the integration of live TV and radio, a 'most watched' list, and personalised viewer recommendations based on previous viewing habits. Later updates see an archive expansion and increased length of time content is available.

2008 - ITV Player (PSB VoD)

ITV Player launches, offering a free, ad-supported catch-up service of its linear broadcasts, as well as access to archive content. It is rebranded as ITV Hub in 2015, and again as ITVX in 2022 - an update that also includes a subscription based 'premium' offering with an extended catalogue.

2008 - Demand Five (PSB VoD)

Channel 5 joins the BVoD fold with its free ad-supported service, having previously had a limited download-only service. Rebranded as 'Demand 5' and then 'My5' in 2015, it is significantly expanded as '5' in 2025 to include content from Paramount's family of brands as well as 5's linear channels.

2010 - LoveFilm Player (SVoD)

'LoveFilm' - a UK-based company originally known for its DVD-by-email rental service - launches a new subscription streaming service, 'LoveFilm Player'. Its catalogue includes Hollywood blockbusters, independent films, documentaries and TV series. Although LoveFilm had offered some of its catalogue through a download service as early as 2005, this dedicated streaming-only service is the first of its kind in the UK. It is relaunched in 2011 as 'LoveFilm Instant'.

2012 - Netflix UK (SVoD)

Netflix launches in the UK and Ireland, marking its European debut. The service - which began as a DVD-by-mail service in the US before introducing streaming in 2007 - offers a large catalogue of licensed films and TV series, but shifts focus in 2013, with the launch of its 'Netflix Originals', and also introduces 'user profiles' - a feature later adopted by other VOD services.

2012 - Now (SVoD / Commercial BVoD)

In the same year, Sky launches Now TV, as a contract-free subscription streaming service. It initially offers films from Sky Movies, putting it in competition with Netflix and LoveFilm Instant. It is later expanded to include content from other Sky platforms such as Sky Sports, Sky Atlantic, Sky Arts, etc. and is rebranded as 'Now'.

2014 - Amazon Prime Video (SVoD / TVoD)

Amazon - the US company initially known for e-commerce - fully acquires LoveFilm (in 2011) and in 2014 absorbs its subscription streaming service 'LoveFilm Instant' into 'Amazon Instant Video'. This subscription model is accompanied by a pay-per- view option (Amazon Video). The service is later rebranded as Amazon Prime Video.

2019 - Apple TV (SVoD)

Apple launches Apple TV+, its own SVoD service focused exclusively on original, high-end content, and is later rebranded as Apple TV in 2025. Apple TV devices and app include a TVoD offering, allowing viewers to rent or purchase content from other studios and publishers.

2020 - Disney+ (SVoD)

Disney launches Disney+, a subscription service with a massive catalogue from across the Disney empire including Pixar films, the Marvel Cinematic Universe, Star Wars Saga, Nat Geo, exclusive Disney Originals, and later Hulu. The service replaces DisneyLife (a subscription based digital membership offering for smart devices, with access to box sets, films, books, music and games, launched in 2015).

2022 onwards - innovation in hybrid monetisation

As competition intensifies and audiences face an expanding array of streaming options, VoD services begin offering ad-supported tiers to diversify revenue streams. In November 2022, Netflix leads the way by rolling out its ad-tier plan in the UK, followed by Disney+ in November 2023. Then, in February 2024, Amazon makes adverts a default part of its Prime Video services in the UK.

Where most VoD viewing is taking place

While the range of VoD services on offer in the UK is considerable, **most viewing is concentrated** across almost a dozen VoD services (together attracting approximately 24% of viewing), alongside video-sharing platforms (19%) and linear broadcasting (47%).

20% 19% 14% 15% 12% ■ BVoD ■ Linear 10% 8% 7% 6% 6% 4% 3% 2.6% 0.36% 0.3% 0.04% 0% Netflix TikTok Disney+ ITV/STV Other broadcasters Twitch /ouTube Channel 4 Channel 5 Prime Video Apple TV+ Hayu BBCNarner Bros. Discovery Paramount + Sk

Figure 11: Share of total in-home video viewing for the largest individual services: 2024

Source: Barb as-viewed (individuals age 4+). Proportion of all in-home video viewing by service. In-home video viewing on TV sets and other devices connected to the home WiFi. 'Linear' includes broadcast content watched live or via recorded playback. Total video viewing also includes some 'unidentified TV set use' which accounted for 11% of total video viewing in 2024. 'VSP' refers to video-sharing platforms.

In comparison, children's viewing in the UK is focused more on social media platforms for sharing videos (39%), and on-demand services (29%), alongside linear broadcasting (16%).

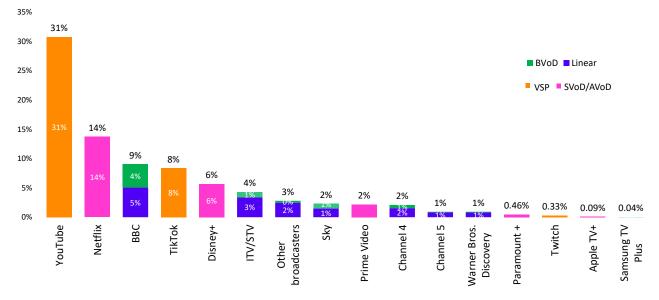


Figure 12: Share of total in-home video viewing for the largest individual services by children: 2024

Source: Barb as-viewed (children 4-15). Proportion of all in-home video viewing by service. In-home video viewing on TV sets and other devices connected to the home WiFi. 'Linear' includes broadcast content watched live or via recorded playback. Total video viewing also includes some 'unidentified TV set use' which accounted for 16% of total in-home video viewing by children in 2024. 'VSP' refers to video-sharing platforms.

The types of content that services are offering

VoD catalogue sizes vary. The most widely viewed BVoD services range from just under 10,000 hours of content to over 20,000, matching the larger global SVoD services such as **Disney+** and **Discovery+**, while those of **Netflix** and **Prime Video** exceed 45,000 hours and 70,000 hours, respectively⁸⁴.

These large services tend to include a range of genres, although some services, e.g. Discovery+, focus specifically on entertainment and factual content.

The appeal of content on a given VoD service to children is relevant to the adequacy of APMs, as is how much children's content (i.e. that is made for and specifically marketed to children) features on services.

Proportionally, **Paramount+** has the most children's content (24% of total catalogue hours), followed by **Disney+** (19%), **Apple TV** (18%) and **BBC iPlayer** (18%)⁸⁵.

However, in terms of the number of hours of children's content, out of 18 tracked services ⁸⁶, four of them - BBC iPlayer, Disney+, Prime Video and Netflix - provide almost two thirds (64%) of the total hours of children's content (figure 13). A further 26% is provided across four services - Paramount+, ITVX, Tubi and Pluto TV. Ten services carry the remaining 10% of children's content.

There is therefore a divide among both BVoD and SVoD between those services which have relatively high amounts of children's content and those which have a smaller proportion of the total.

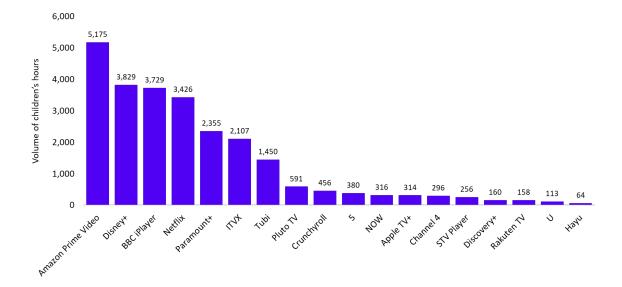


Figure 13: Volume of children's VoD programming by service (hours)

Source: Ampere Analysis – VoD analytics, August 2025. Volume of programming available in UK catalogues.

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⁸⁴ Ampere Analysis – VoD analytics, catalogue size data for August 2025.

⁸⁵ Ampere Analysis – VoD analytics, August 2025.

⁸⁶ Ampere Analysis – VoD analytics, August 2025; includes Amazon Prime Video, Apple TV, BBC iPlayer, Channel 4, Crunchyroll, Discovery+, Disney+, Hayu, ITVX, 5, Netflix, Now, Paramount+, Pluto TV, Rakuten TV, STV Player, Tubi, U.

A2.Glossary

Age assurance: Enables service providers to determine whether a user is an adult or a child, ensuring that only those users established to be an adult can access content deemed suitable for over 18 audiences. Methods range from prompts requesting a user to self-declare their age (e.g. entering a date of birth) to photo-ID matching, or age estimation using biometric facial analysis.

Age filters: Allow viewers to apply an age-rating-based limit to the content made available to their VoD service account, or to a profile within it.

Age ratings and classifications systems: These frameworks categorise content based on suitability for different age groups and the law, if relevant. They often use familiar symbols, numbers or letters to indicate:

- a minimum recommended age;
- that material is generally unsuitable for younger viewers or suitable for audiences of a particular age or over; and
- that the content was originally broadcast post-watershed.

Some systems also include keywords, warnings or scores to highlight specific concerns.

Audience Protection Measures (APMs): In accordance with section 368OB(4) of the Act, audience protection measures are: "measures that are capable of assisting in protecting audiences from harm...". Section 368OB(4) gives a non-exhaustive list of examples: (a) age rating or other classification systems; (b) content warnings; (c) parental controls; and (d) age assurance measures.

Advertising-supported Video-on-Demand ("AVoD") services: On-demand/streaming services that include advertising and are not affiliated with broadcast TV channels (distinct from BVoD).

The British Board of Film Classification ("BBFC"): The statutory film and video classification regulator for the UK which also works in partnership with many VoD providers who apply BBFC ratings to their content. BBFC ratings are U (suitable for all), PG (parental guidance), 12A/12, 15, 18 and R18 ('sex works').

Broadcaster Video-on-Demand ("BVoD") services: VoD services provided by broadcasters of linear TV channels. Examples of BVoD services include BBC iPlayer, ITVX and Sky On Demand. Such services typically include programmes previously broadcast on linear services and, increasingly, programming that has not yet been broadcast or is only intended for the BVoD service.

Child profiles: Profiles designed specifically for children that include only age-appropriate content and are easy to set up – usually with 'one-click' of a button.

Content warnings: Short notices, audible or written, usually shown before or during playback. They alert viewers to themes or issues – such as bereavement, violence or strong language – that may influence viewing decisions, especially for children.

Linear TV: Content that is watched live as it is being broadcast (or delayed by pausing live TV or using a recording device), with scheduled times for each programme. Examples of linear TV channels include BBC One, ITV1, and Channel 4. Linear TV excludes on-demand/streaming services.

NICAM: The Netherlands Institute for the Classification of Audiovisual Media. Its <u>Kijkwijzer ratings</u> <u>system</u> provides age ratings and content information for films and television programmes shown in the Netherlands.

Non-UK on-demand programme service ("Non-UK ODPS"): A service which: meets conditions (a) to (d) of an On-Demand Programme Service (see below), but does <u>not</u> meet one or both of the conditions of an ODPS listed at (e) and (f) (see below); and the members of the public for whose use the service is made available are or include members of the public in the UK.

On-Demand Programme Service ("ODPS"): A service is an ODPS if: a) its principal purpose is the provision of programmes; b) access to it is on-demand; c) there is a person who has editorial responsibility for it; d) it is made available by that person for use by members of the public; e) that person's head office is in the United Kingdom, and; f) editorial decisions about the service are taken in the United Kingdom.

ODPS Rules: Set out in Part 4A of the Communications Act 2003 these rules for ODPS contain a range of editorial and administrative provisions, including requirements for ODPS providers to notify Ofcom, pay fees, and ensure that services provide appropriate protection for under-18s.

Parental Controls: These tools restrict access to content based on age or suitability. Controls may include:

- PIN-protected access which restricts specific content, or profiles;
- curated profiles with age-appropriate content selected by a service; and
- settings that allow parents to choose what other users can view via profiles.

Service-level controls may result in general profiles, e.g. child profiles that restrict all users from viewing materials of a particular age rating, or for catch-up content, restricts content that was broadcast on linear television after the watershed.

User-level controls differ in complexity and can allow wider discretion and, potentially, different selections and restrictions on material under different profiles.

PIN: Personal Identification Number.

Public Service Broadcasters ("PSBs"): In the UK, these are the BBC, those providing the Channel 3 services, Channel 4 Corporation, the Channel 5 licensee, and S4C. While all BBC public service television channels are PSB channels, only the main channels of each of the other PSBs have this status. They have a collective duty to fulfil public service broadcasting purposes and objectives.

Social media platforms for sharing videos: Online video services which allow users to upload and share videos with the public. Examples include YouTube, TikTok, and Twitch.

Subscription Video-on-Demand (SVoD) services: VoD services which require paid-subscriptions. Examples include Netflix, Amazon Prime Video, and Disney+.

Tier 1 services: Under the Media Act 2024, the Secretary of State may by regulations provide that an ODPS, or a non-UK ODPS, is a Tier 1 service if it is specified, or falls within a description which is to be specified in the regulations. As at the time of writing, the Secretary of State has not made regulations to determine which services are Tier 1.

Tier 1 Standards Code ("Tier 1 Code"): The code to be drafted and enforced by Ofcom, and which will set out rules for enhanced content standards, for Tier 1 services. Those standards will be more closely aligned with those of the Broadcasting Code than the current ODPS Rules. The Tier 1 Code will not replace the ODPS Rules, which will remain in force for all ODPS, including any which might become Tier 1 services.

Transactional VoD Services ("TVoD"): Offer consumers the ability to buy individual pieces of content, on a one-off basis, to own or rent.

Video-on-Demand ("VoD"): Video-on-demand, split in UK legislation into ODPS and Non-UK ODPS.

Watershed: Refers to the start of the time period running from 9pm to 5.30am, during which Ofcom-regulated linear television broadcast should generally exclude content unsuitable for children.