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# Audience Expectations of Linear and On Demand Services

**Ipsos for Ofcom** 

Warning: This report contains highly offensive language and discussion of content which may cause offence.

### **Contents**

Executive summary		4	
	Introduction		
	1.1	Background to the research	7
	1.2	Methodology	8
	1.3	Video clip stimulus and hypothetical scenarios	9
	1.4	Glossary of key terms	15
2	Aud	lience behaviours and platform expectations	17
3	Attitudes towards harm and offence2		
4	What influences participants' views on whether content is acceptable?		
5	The	acceptability of archive content	34
6	Protecting children		
7	Ехр	ectation of regulation on linear TV and VoD services	45
8	Appendix A: Summary of attitudes towards clips and hypothetical scenarios		51
	Tab	le A: Summary of attitudes towards stimulus clips	51
	Tab	le B: Hypothetical scenarios used to explore expectations of harm and offence	59
9	Appendix B: Research materials		61
	Onli	ne community pre-task activities	88

### **Executive summary**

Ofcom commissioned Ipsos to conduct research to help them understand audience expectations of both linear TV and Video on Demand services (VoD).¹ This was to update and build on research that Ipsos had previously carried out for Ofcom in 2019/20, which explored how audience expectations of audiovisual content were evolving as seen through the lens of protecting: children from content that is unsuitable for them; and audiences in general from potentially harmful and offensive content.² Reflecting the recent changes in the media landscape, this new research places a larger emphasis on VoD content compared to the previous study.

This latest research was qualitative in nature and involved a series of multi-phased online deliberative workshops with members of the public across the UK, alongside depth interviews with 16-17 year olds. Mainstage fieldwork was conducted between 12<sup>th</sup> January and 9<sup>th</sup> February 2023.

There were similar expectations of linear TV and Broadcast Video on Demand ("BVoD") services, whilst Subscription Video on Demand ("SVoD") services were considered distinct from them both.

Participants reflected that their viewing habits have changed considerably over recent years. The wide variety of choice in channels, services and content has changed how they find and view content, with many participants highlighting how VoD services have become embedded in their viewing habits.

Linear TV still retained a place in many participants' viewing habits, although many initially said they watched little content on it. However, upon further deliberation, most participants recognised the role that linear viewing still played for them, particularly for "event television" and live sporting or cultural events.

BVoD services were generally perceived as an extension of their associated linear channels, and were seen to offer similar content, with participants often using these services to catch up on broadcast programmes they may have missed. Whilst there was some recognition that BVoDs did host content beyond what had been broadcast on linear channels, SVoD services were considered distinct from both linear TV services and BVoDs and more likely to offer 'edgier' content.

The context in which viewers access content has become increasingly important when determining acceptability and this was found to differ between linear TV and VoD platforms.

Initially, many participants said nothing on TV caused them harm or to be offended and found it considerably easier to describe how other people might find content potentially harmful or offensive. As the discussion evolved, participants identified categories of content which might cause them concern, including content featuring, for example: swearing; misogyny; blasphemy; ageism; homophobia; religious

<sup>&</sup>lt;sup>1</sup> Linear TV is television is watched live as it is being broadcast, with scheduled times for each programme. Examples of linear TV channels include BBC, ITV, and Channel 4; VoD services include Broadcaster Video on Demand services (BVoDs) and Subscription Video on Demand services (SVoDs). BVoDs are video on demand services provided by broadcasters of linear TV channels. Examples of BVoD services include BBC iPlayer, My5 and ITVX. Such services are likely to include programmes previously broadcast on linear services and increasingly, programming that has not yet been broadcast or is only intended for the BVoD service. SVoDs are video on demand services which require subscription. Examples include Netflix, Disney+ and Amazon Prime Video. For the purposes of this report, attitudes to advertising funded VoD services (such as Amazon Freevee) were not specifically explored.

<sup>&</sup>lt;sup>2</sup> The 2019/2020 research is available here: <a href="https://www.ofcom.org.uk/research-and-data/tv-radio-and-on-demand/audience-expectations-in-adigital-world">https://www.ofcom.org.uk/research-and-data/tv-radio-and-on-demand/audience-expectations-in-adigital-world</a>

discrimination; sexual violence; racism; and paedophilia. They emphasised that acceptability of this content depended on the context in which it is shown.

Across VoD and linear TV services, the acceptability of content varied based on three factors:

- 1. **Context:** This included the service being watched, how viewers are accessing it, and what was in place to warn viewers or prevent vulnerable audiences or children from viewing it.
- 2. **Content:** This included the words, images, sounds and storyline.
- 3. **Intent:** This included participants' understanding of the perceived intentions behind why the content was created and why a provider has decided to show it.

Contextual factors which participants considered when judging whether content was acceptable for linear TV tended to be similar to previous research. These included: when content was scheduled on linear channels, which was still perceived to be important; as well as the provision of sufficient content information or warnings at the start of linear programming so audiences could make informed decisions about whether to watch something. Channel expectations and programme titles also played a role.

Many of the themes and issues raised in the 2019 Research have become more prominent as the public have become increasingly familiar with using BVoD and SVoD services. For example, the importance participants placed on the way viewers actively choose content on VoD platforms. Most participants felt these services could push the boundaries further in terms of showing edgier content, although SVoDs to a greater degree. It was felt that audiences exercising active choice and self-selecting what to watch on VoD platforms offered its own protections to those viewers. This was in addition to the greater opportunity for viewers to engage with content information, warnings and trailers than on linear TV.

However, there were some limits to acceptability of different types of content, even on SVoD services. Content became less acceptable across platforms if it was seen by participants to be making light of serious or sensitive topics or targeting groups who were perceived to be vulnerable. For a few participants, this was when content was deemed to have crossed the line to become unacceptable and not suitable to be available on any services.

Archive material shown to participants split opinions, with many having nuanced and complex thoughts on availability of this type of content. Generally, if the content was not obviously offensive to them, then participants were more likely to want to continue to access it. But if it included language or themes they viewed as clearly discriminatory, they could be less accepting of the content. Participants also had different opinions as to how archive material should be treated, such as whether there should be compulsory warnings alerting audiences to potentially discriminatory content, or whether providers should be obliged to remove or edit particular scenes to remove such content.

Most parents and carers trusted protection measures for young children, but there was recognition they were less effective as they got older.

Whilst the responsibility for protecting children was perceived primarily to be with parents and carers, participants wanted service providers to have a role in making this easier for them. Carefully curating content on children's profiles and providing appropriate warnings or age ratings were seen as effective ways to help parents and carers make easier judgements about the suitability of content for their child to view. However, the effectiveness of these measures as children got older was seen to be more limited.

That said, the wider internet was perceived as being far riskier for children of all ages, and parents felt there was more chance of their children being exposed there to extreme content. Children's internet activity was seen as harder to monitor or protect against compared to children's use of TV or VoD services.

Whilst participants were aware that regulations existed for linear TV, and assumed these extended to BVoDs, they were generally uncertain about the regulation of SVoDs.

Participants had not necessarily heard of the Broadcasting Code, but once it was explained to them, they were generally supportive and thought it was comprehensive. As BVoDs were closely associated with specific broadcasters, participants thought these rules would extend to them also. Participants generally expected different rules to apply to SVoDs because of the range of protection tools they offer and the need to pay a subscription to access them. Some also assumed that SVoDs may follow different rules because of their international nature.

Once told how VoD services were regulated, there was some surprise about how varying and complex the rules were across different services and platforms. Many participants were concerned about there being VoD services available in the UK which are not regulated by Ofcom. Others were less surprised, having expected this variation based on their experience of different platforms.

There were doubts over whether regulation would change in the future. Some participants questioned whether they would want the regulations to change, fearing it could limit their freedom of choice. However, others considered that content made available in the UK should comply with UK standards. Participants generally wanted a single independent body in the UK to complain to if needed.

### 1 Introduction

Warning: this report contains offensive language and graphic descriptions which may cause offence.

### 1.1 Background to the research

The UK's media landscape has changed dramatically over the last decade and continues to evolve at pace.

The past few years have seen the launch of several high-profile VoD services, including Disney+, Apple TV+ and Paramount+. Around two thirds of UK households now have access to an SVoD and over 10% of viewing of BBC, Channel 4 and Sky content now takes place via their BVoDs.<sup>3</sup> The way in which viewers access these services has also shifted as they can now access linear TV (i.e. watching a programme as it is scheduled and broadcast by a channel), BVoDs and SVoDs, often through the same menu.

These developments have necessitated regulatory change. In 2020, existing rules<sup>4</sup> around protecting children when accessing VoD services were widened to require VoD services to have appropriate measures to protect children from a range of potentially harmful material. In 2022, the Government also published proposals to more closely align the regulation of, for example, the largest VoD services with that of broadcast television, as well as give powers to Ofcom to regulate some VoD services not based in the UK.<sup>5</sup>

Within this context, Ofcom commissioned Ipsos UK to understand audience expectations of both linear and VoD services. This was to provide a timely update and build upon research that Ipsos UK had previously run for Ofcom in 2019-2020, which explored how audience expectations of audio-visual content was evolving then.<sup>6</sup> Reflecting the recent changes in the media landscape, this new research places a larger emphasis on VoD content compared to the previous study.

Ipsos UK conducted a programme of qualitative research of deliberative workshops to help Ofcom understand four primary objectives:

- to understand awareness and attitudes towards current and future regulation of content across a variety of platforms and services, with a specific focus on the way in which audience expectations of content on VoD services might differ from linear services;
- 2. to understand the accepted standards of potentially harmful and offensive content across both linear and VoD services:
- **3.** to explore how audiences perceive children are being, and should be, protected when consuming programming across a range of platforms; and

Media Nations 2023

<sup>&</sup>lt;sup>4</sup> Statutory Rules and Non-Binding Guidance for Providers of On-Demand Programme Services (ODPS)

<sup>&</sup>lt;sup>5</sup> Since fieldwork finished, the Government have published the Draft Media Bill in March 2023 which outlines amendments to this regulation, including greater consistency in how different services are regulated. The Draft Media Bill (29 March 2023) can be found here: <a href="https://www.gov.uk/government/publications/draft-media-bill">https://www.gov.uk/government/publications/draft-media-bill</a>

<sup>&</sup>lt;sup>6</sup> The 2019/2020 research is available here: <a href="https://www.ofcom.org.uk/research-and-data/tv-radio-and-on-demand/audience-expectations-in-adigital-world">https://www.ofcom.org.uk/research-and-data/tv-radio-and-on-demand/audience-expectations-in-adigital-world</a>

4. to consider these findings in light of previous research conducted on audience expectations.

This report details the key themes from across the research. Throughout, we have referred to "participants" and provided evidence through anonymised verbatim comments. Quotations have been attributed providing information on key characteristics such as gender, region, age, ethnicity and whether they are a parent.

### 1.2 Methodology

A multi-phased qualitative research design was developed to explore participants' experiences of content across different platforms and attitudes towards regulation. The different stages of the design are summarised below in Figure 2.1.

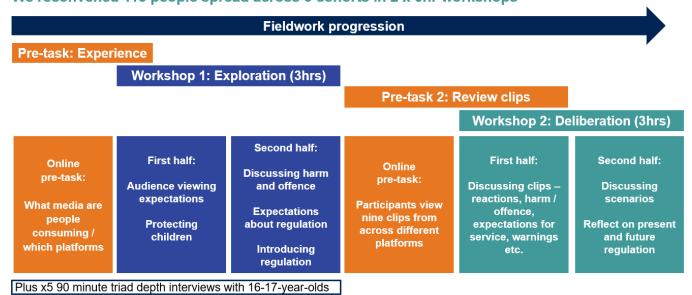
Mainstage fieldwork took place between 12<sup>th</sup> January and 9<sup>th</sup> February 2023. It consisted of 115 participants across five cohorts with each participant attending two online workshops which were each three hours long. Before each workshop participants were asked to complete a short online task in their own time; the first task being a media diary, and the second task involved reviewing nine video clips before discussing these in the workshop. The content of these nine video clips has been summarised later in this chapter (Section 1.3).

The two evening workshops were a week apart from each other. This "reconvened" approach was designed to introduce participants to concepts in the first workshop (e.g. the complex regulatory landscape or the meaning behind terms such as harm and offence), before giving them time to independently reflect on what they had discussed. This allowed participants time to digest learnings ahead of reviewing the nine video clips, which were then discussed in the second workshop. The approach provided the opportunity to capture participants' spontaneous views, alongside more considered opinions.

Asking participants to review the clips in their own time also meant we could gauge their personal reactions before letting them hear the opinions of others.

Figure 2.1: The structure of the research

We reconvened 115 people spread across 5 cohorts in 2 x 3hr workshops



The 115 participants who took part in the **mainstage research** were split across five workshop cohorts. Each cohort was then split into three mini-groups with six to eight participants in each.

Each mini group was comprised of:

- At least one participant from: South of England, North of England, Wales, Scotland, Northern Ireland.
- An equal split of male and female participants.
- A balance of 18-34s, 35-54s, and 55+.
- At least two participants from an ethnic minority background.
- A number of parents, including a range of parents of children of different ages.
- At least one who said they had seen something they had been offended by, and where
  possible at least one who said they had previously complained to Ofcom about something they
  had seen.

The research was piloted with eight participants in early December 2022. This consisted of one three-hour workshop which used a condensed version of the discussion guide. As we were finessing our approach during the pilot, some different clips and scenarios were used which were not then shown in the mainstage. These decisions were made based on how the clips stimulated relevant conversations.

The mainstage was complemented by five 'friendship groups' among 16-17 year-olds. Each consisted of a single **90-minute online interview** with three participants who knew each other. In total **15 teenagers** took part in the research with an equal gender balance and three participants from an ethnic minority background. Each interview was based in a specific region covering: South England, North England, Scotland, Wales and Northern Ireland. This aspect of the research used a condensed discussion guide and stimulus. Teenage participants were not shown any video clips but instead discussed a set of hypothetical scenarios similar to those used in the mainstage research.

### 1.3 Video clip stimulus and hypothetical scenarios

Between the workshops, participants in the mainstage research were asked to watch nine short video clips in their own time. These clips were each available on a VoD service or had been shown on linear TV at the time of the research. They were made available to participants via an online platform. Before watching the clips, participants were provided with warnings about the content (although they were not shown the specific warnings that were given to viewers of the content when it was viewed on the original service). Participants were not initially told which service each clip was broadcast or available on.

This report draws in part upon discussions about the acceptability of these clips during the second workshop. Table 1.1 below provides a short summary of what was shown in these clips and any accompanying content warnings. These official warnings were only shown to participants during the second workshop when discussing each clip in turn.

Warning: this table contains offensive language and graphic descriptions which may cause offence.

### Table 1.1: Video clips watched by participants ahead of the research

When discussing warnings, the following terms are used in this table:

**Ratings:** The recommended age classifications given to a programme by video on demand service providers. This rating may be decided by the service providers themselves or another organisation such as the BBFC. Each of the BVoD and SVoD services from which clips were taken include parental control features that prevent more mature content from being viewed without the input of a PIN.

**Guidance:** A label that can be used to alert viewers that a particular programme includes stronger content that viewers may wish to avoid or may be unsuitable for children.

**Description from service:** This text is offered by the provider to set viewers' expectations by giving a summary of the content they are about to watch.

## Tontent A music video for "Happy Xmas (War is Over)" by John Lennon which shows moving images of war and other tragedies. It includes pictures of children suffering in war zones. The video was released in 2003 and was recently shown on linear TV. It appeared during continuous festive Christmas programming and was shown between music videos of other well-known Christmas songs such as "Walking in the Air" and "All I Want For Christmas Is You".

### The Handmaid's Tale | Service: Channel 4 linear channel and BVoD service

The Handmaid's Tale   Service: Channel 4 linear channel and BVoD service	
Content	Warnings
This clip is taken from a dystopian drama series in which women able to bear children are treated as property. It shows a scene in which a group of women are being punished for insubordination as they are walked up onto a platform and nooses are put around their necks, suggesting they will be hanged. Emotive music plays over the visuals.	Rating: G (on BVoD service)  Once a viewer clicks to watch the show, the following text appears in a pop-up box and they need to confirm their age before proceeding:  "Guidance: Strong language and strong violent scenes which viewers may find disturbing. This programme isn't suitable for younger viewers. By clicking play you confirm that you are over 16 years old, and that you accept our Terms and Conditions".

### Little Britain | Service: BBC iPlayer

### Content

This was taken from a comedy sketch show which was first broadcast in 2002. This excerpt shows an assistant using offensive terms to describe an Asian student over the phone to her manager. They are described as having "yellowish skin, slight smell of soy sauce...the ching-chong china man".

### Warnings

**Description from service:** "Matt Lucas and David Williams take a comic look at life in Britain".

Rating: G

The following is shown viewers before they click on watching the show:

"Contains adult humour. Contains discriminatory language".

### The Aristocats | Service: Disney+

### Content

This is a clip from an animated film about a kidnapped family of aristocratic cats and the alley cat who helps them. This segment shows the cats singing and dancing to "Everybody Wants to be a Cat" with a feline jazz band. It features "Shun Gon the Chinese Cat" who is depicted as having slanted eyes and buck teeth. He plays the piano using chopsticks and sings: "Shanghai, Hong Kong, Egg Fu Yong! Hya ha ha ha ha! Fortune cookie always wrong! Hya ha ha!"

### Warnings

**Description from service:** "A pedigree cat and her three kittens are catnapped by a greedy butler who hopes to gain the inheritance left to them. Things look hopeless until they are befriended by Thomas O'Malley, an easy-going alley cat (1970).

Family, Comedy, Animation, Action-Adventure, Musical".

Rating: 0+

After pressing play, the film features the following content warning, which cannot be skipped:

"This programme includes negative depictions and/ or mistreatment of people or cultures. These stereotypes were wrong then and are wrong now. Rather than remove the content, we want to acknowledge its harmful impact, learn from it and spark conversation to create a more inclusive future together. Disney is committed to creating stories with inspirational and aspirational themes that reflect the rich diversity of the human experience around the globe. To learn more about how stories have impacted society visit: www.disney.com/storiesmatter".

### Erax | Service: Netflix

### Content

In this children's short film, a woman buys a book for her niece, and they accidentally release the Erax creatures who are short scary looking monsters; these creatures have deep menacing voices, and the clips shows the moment where they escape from the book. The electrics falter and the lights go out, leaving the room dark. The monsters growl in their face, causing them to scream. The monsters chase them as they try to escape, but the front door is magically blocked, so they are unable to leave. The monsters charge at them and one bites the aunt's ankle. The niece bashes the monster with the book and the monster goes back inside it. The scene builds tension through dark lighting and music.

### Warnings

**Description from service:** "Monstrous creatures leap from a magical storybook and unleash mayhem and mischief for Auntie Opal and her tween niece Nina in this spooky short film.

Mysteries, Family Features, Children & Family Films".

Rating: PG

Once the content starts playing the following briefly appears at the top of the screen:

"Violence, threat, parental guidance suggested".

### Jimmy Carr: His Dark Material | Service: Netflix

### Content

This clip is taken from a stand-up comedy special in which comedian Jimmy Carr jokes about a variety of subjects, including rape and sexual abuse. He presents these jokes to a laughing audience. It includes statements like "I don't have to pay for sex, I'm a rapist" and "you can prevent any rape, just say yes."

### Warnings

**Description from service:** "Jimmy Carr finds humour in the darkest of places in this stand-up special that features his dry, sardonic wit – and some jokes he calls 'career enders'.

British, Stand-up comedy, Comedies, Raunchy, Witty".

Rating: 18

Once the content starts playing the following briefly appears at the top of the screen:

"Maturity rating: 18 / language, sexual violence references, discrimination / Suitable for adults only".

### The Punisher | Service: Disney+

Content

**Warnings** 

This clip was taken from a Marvel action series about a marine seeking to avenge the murders of his family. It is from the season finale and shows a violent fight between two of the main characters on a merry-go-round. One shoots the other, and then shoots a woman who had been creeping up behind him, killing her. The two men then violently beat each other, slamming each other against the floor. A knife is pulled and impaled through a man's arm, as they continue fighting. A shard of glass is picked up and impaled into one man's stomach and his face is then scraped along broken glass as he screams, and blood pours out. His arm is snapped as he is thrown against the mirror. His head is then repeatedly bashed against the broken mirror.

**Description from service:** "As the authorities close in, an exhausted but unbroken Frank vows to put an end to the war that has consumed his life.

Thriller, Super Hero, Crime, Action-adventure".

Rating: 18+

### The Boys | Service: Amazon Prime Video

### Content

The clip was taken from a series about superheroes who embrace the darker side of their celebrity and fame. It shows characters attending a superhero "orgy" party with full nudity and characters participating in explicit sexual acts. Genitalia is shown and it ends with a character being covered in ejaculate. The scene also includes repeated use of offensive language.

### Warnings

Rating: 18

Once the content starts playing the following briefly appears at the top of the screen:

"RATED 18 / nudity, violence, substance use, alcohol use, smoking, foul language, sexual content".

Before the show starts, as part of the programme this warning appears:

"Some scenes may not be suitable for some, really most, let's be honest all viewers, but rest assured that any consensual relationships depicted, be they human, animal, superhero, or other, aren't real, harmed no one, and in fact cost a hilariously large amount in visual effects".

Hillbilly Nation | Service: Channel 4's YouTube (not broadcast on linear channel or BVoD)

**Content** Warnings

Hillbilly Nation features two viral TikTok stars - King Billy and The Mountain - who are self-proclaimed 'hillbillies' from Devon and shows them attempting several dangerous stunts with cars, applying a tattoo onto someone's bum, before then blowing a large open flame at them. The clip shows partial nudity and people vomiting.

Once the content starts playing the following briefly appears at the top of the screen:

"Adult humour & content".

Participants also discussed range of hypothetical written scenarios during the first workshop when discussing harm and offence. These scenarios were developed to stimulate discussions on the acceptability of a wider variety of situations Table 1.2 details these hypothetical scenarios.

Table 1.2: Hypothetical scenarios shown to participants in Workshop 1.

1	A comedy programme where someone uses the word c*nt.
2	A documentary showing someone injecting heroin into their arm.
3	A drama with a graphic sex scene showing full frontal nudity.
4	A historical drama about slavery where someone uses the "N" word.
5	A film depicting a violent fight which results in someone being murdered with a hammer blow to the head.

Hypothetical scenarios were also used during the second workshop after participants had discussed the clips. Findings from discussion generated by these scenarios are used where relevant throughout the report.

Table 1.3: Hypothetical scenarios shown to participants in Workshop 2.

1	In a live current affairs discussion programme on television, a contributor makes an offensive comment about migrants. The host immediately apologises for any offence caused. After the programme is broadcast it is made available on the channel's catchup service, with the offensive comment still included.
2	When browsing the catalogue on a subscription VOD service, a trailer for a horror programme starts to play that includes potentially frightening and bloody images of zombies attacking a group of humans.
3	On a broadcaster video on demand service, you can watch a scheduled linear channel showing crime dramas that is only available to watch online. At 10am, this showed a scene of an autopsy of a female murder victim with close ups of her wounds and body.
4	A family adventure film that was rated PG (parental guidance) at the cinema has a 9+ rating on Disney+.
5	You start listening to a radio service. During the daytime it plays a song that includes multiple uses of the word "f*ck".

### 1.4 Glossary of key terms

Throughout the workshops some key terms were explained to participants to assist conversation and develop their understanding beyond their spontaneous reactions towards more considered and informed opinions. Participants were often familiar with some of these concepts but did not necessarily use this language when describing them. These key terms are summarised below in Table 1.3.

Table 1.4: Glossary of key terms

Age ratings	The recommended age classifications given to a programme by video on demand service providers. This rating may be decided by the service providers themselves or another organisation such as the BBFC.
British Board of Film Classification (BBFC) ratings	British Board of Film Classification, the body responsible for providing age ratings for cinema, DVD and Blu-Ray releases. BBFC ratings are U (suitable for all), PG (parental guidance), 12A/12, 15, 18 and R18 ('sex works').
Broadcaster Video on Demand (BVoDs)	Broadcaster video on demand. These are video on demand services provided by broadcasters of linear TV channels. Examples of BVoD services include BBC iPlayer, My5 and ITVX. Such services are likely to 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 which can be set up on video on demand services and tailored to ensure that children can only view content which is age appropriate.
Content descriptions	The short descriptions of content provided alongside programmes on video on demand services.
Content warnings	These would be about potentially unsuitable material in the programme such as offensive language or graphic violence. These could be visual (when a programme is selected on a VoD service) or verbal (by a preprogramme announcement on broadcast television).
Guidance labels	A label that can be used to alert viewers that a particular programme includes stronger content that viewers may wish to avoid or may be unsuitable for children. Examples include "G" for Guidance or "Mature".
Harmful content	Harmful content might include things which could lead to someone being: (1) Physically harmed – such as promoting dangerous behaviour or self-harm, giving unsafe health or medical advice (2) Financially harmed – such as through mis-selling or mis-promoting products (3) Emotionally or mentally harmed – such as through viewing disturbing or upsetting content.
Linear TV	Television that is watched live as it is being broadcast, with scheduled times for each programme. Examples of linear TV channels include BBC One, ITV1, and Channel 4.

Offensive content	Offensive content might include things which people find insulting or inappropriate – either to themselves or others. This could include swearing, rude jokes, stereotypes or derogatory statements about marginalised groups or protected characteristics.
PIN codes	Personal identification numbers which enable viewers to access certain content, e.g. programmes with an age rating of 15 or above. Children or other viewers without the number are unable to access this material.
Protection measures	An assortment of measures designed to (a) protect viewers from seeing material which they might want to avoid, and (b) enable parents and carers to protect children from unsuitable content. These measures include age ratings, content descriptions, child profiles and PINs.
Subscription Video on Demand (SVoDs)	Subscription video on demand. These are video on demand services which require subscription. Examples include Netflix, Disney+ and Amazon Prime Video. For the purposes of this report, attitudes to advertising funded VoD services (such as Pluto TV) were not specifically explored.
The Broadcasting Code	The Broadcasting Code outlines the rules which programmes broadcast on television and radio in the UK must abide by.
Video Sharing Platforms (VSPs)	These are online video services which allow users to upload and share videos with the public (e.g. YouTube or TikTok).
Watershed	Material unsuitable for children should not generally be shown before 9pm and after 5.30am on broadcast television.

## 2 Audience behaviours and platform expectations

Participants reflected that their viewing habits have been changing rapidly over recent years.

Participants recognised there is now a greater variety of content available, across a larger number of services, even when compared to recent years. They described the challenges of navigating the huge choice available; there is such a wide variety of content and yet sometimes they still struggle to find something to watch. Those living with family or friends said it was often hard to agree what to watch together.

"When you have so many things like Netflix, Amazon, sometimes it takes you ages to agree on something to watch." Scotland, Male, 35-54, White, Parent (12-15)

One way they decided what to watch was through word of mouth. This included through online platforms, particularly social media. They recognised that shows can gather a 'buzz' online, which make viewers feel as if they need to watch them because others are. Participants also liked receiving recommendations from people who they trusted to have similar viewing tastes to them.

"I have very little time where I'm able to watch TV so if I hear friends talking about a series, or something on the radio talking about a certain show, or on Facebook and I like the sound of it. I don't want to use my hour or so in front of the TV to look things up." Wales, Female, 35-54, White, Parent (7-11, 12-15)

Another way they navigated the abundance of choice available, specifically on VoD platforms, was by relying on recommendations from algorithms. Participants discussed how they would watch shows which had been promoted to them. This was because they assumed the recommendation is based on their previous viewing habits, which encourages them to watch it.

"If I am on Netflix, it might lead into something else. If they recommend it that would trigger me to watch something." Northern Ireland, Female, 35-54, White, Non-parent.

While many described still relying primarily on their TV set to consume both linear TV and VoD content, they recognised the way in which they do so is changing. They can now easily flick between multiple VoD services on their smart TVs, instead of being restricted to linear or to one VoD service. Some also mentioned using alternative devices to watch TV content, including laptops, tablets, phones, and games consoles. Parents explained their older children are more likely to use these other devices if they are watching something by themselves.

"With having three boys it's usually we're all watching things in multiple rooms. At the moment we could have one watching Netflix, one watching things on Sky or BBC iPlayer, but at the weekend we typically watch a movie in the main room and that's a family decision." Scotland, Female, 18-34, White, Parent (7-11, 12-15)

<sup>&</sup>lt;sup>7</sup> For example see *Protecting Audiences in an online world* for equivalent findings from 2014: https://www.ofcom.org.uk/ data/assets/pdf file/0027/79371/protecting audiences report.pdf

Most described how their viewing habits have changed as VoD services become more embedded in their viewing habits. Viewers have shifted from watching multiple scheduled shows on a weekly basis, to now focusing on viewing one or two series at a time on VoD. They are more likely to binge-watch as series become available, sometimes to avoid spoilers online and because they felt cliff-hangers encourage them to watch the next episode immediately if it is readily available.

"I could binge watch for 12 hours. I don't do any research. I can be influenced by the title or just the first two seconds. I can give up on it after two seconds if it didn't do it for me. South England, Female, 55+, Ethnic minority, Non-parent.

There was a gap between participants' spontaneous recall of their viewing habits and their more considered recall.

Participants' perceptions about how much they watched linear TV changed as they reflected on their viewing in more detail. While they watched a range of programmes on linear TV, they typically associated it more with genres such as news, political shows, sports, and light entertainment such as soaps, reality shows, quizzes and talk shows. Many said they did still watch linear TV, describing favourite shows they tuned into when broadcast, often out of habit. This was more common among older participants.

"For me it's often watching out of habit. Especially with soaps that's just habit. They are on." North England, Male, 55+, White, Parent (Child left home)

When initially asked, some other participants, particularly some younger participants, said initially that they did not watch any linear TV. They described linear TV as having little content which appeals to them.

Overall, participants said they were watching less content through linear TV than they did in the past. They often described being frustrated by the lack of flexibility offered by linear and considered this a reason for increased use of VoD services. For example, on linear TV, they disliked having to watch adverts, and not being able to binge-watch content as easily. Some also disliked not always being able to pause, rewind or restart a show if they missed the beginning when using a TV service without this functionality.

"I actually hated having to wait for the next episode and so now I do tend to binge watch things elsewhere." North England, Male, 55+, White, Non-parent.

However, as the discussion developed and participants reflected on their viewing behaviours, most recognised that linear still played a role in their viewing habits. For some this included having linear TV on in the background when doing other things. For younger participants, linear TV was also associated with routine family viewing, for example, always watching soaps together or watching light entertainment in the evening – particularly reality TV shows.

"I don't really watch normal linear television. I don't think I have since I was in primary school. I only really watch Love Island on it." South England, Female, 16-17, Ethnic minority, Non-parent.

Indeed, many participants also went on to describe watching linear TV for "event television" such as the final episode of a drama or reality TV show (e.g. *Line of Duty* or *Love Island*), a major sports fixture or a

large event such as *Eurovision*. For these showpiece occasions they wanted to watch programmes as they were broadcast, allowing them to take part in discussions with friends or online and, if relevant, avoid spoilers.

"It's based on wanting to watch something live, news, sports, reality TV. To not find out who gets voted out before you find out on social media or from other people. That's linear TV." South England, Male, 35-54, Parent (12-15).

BVoDs were seen as an extension of linear TV, and principally perceived as catch-up services.

Most participants perceived BVoDs as an extension of their associated linear channels and expected them to offer very similar content. They were generally familiar with using BVoD platforms such as BBC iPlayer, ITVX (formerly ITV Hub) and Channel 4 (formerly All4). They described using these services to catch up on episodes they had not seen when broadcast, particularly daily soaps or reality TV. Otherwise, they were worried they would miss developments in a particular episode, making it harder to enjoy the programme in future.

"I think BVoDs are pretty much the same as linear. It's just, what you've missed on actual TV. You can just watch it on demand." *Northern Ireland, Male,18-34, White, Non-parent.* 

Participants often noted that BVoDs offered the ability to watch content that was originally broadcast on linear television, but with greater flexibility. For example, having shorter adverts or being able to catch-up and watch a programme at a time that suited them.

"I use BVoD for catching up, but some give you the entire thing. Some only give you a weekly episode." Northern Ireland, Female, 18-34, White, Non-parent.

There was also some recognition that BVoD platforms, especially ITVX, were starting to host content beyond what had previously been broadcast on related linear channels. However, not all participants were familiar with this, and many continued to strongly associate BVoD platforms with their related linear channels.

"BBC iPlayer would be where you would catch up on something if you missed it, same with Channel 4. I've only found ITVX to have different programmes to ITV." South England, Female, 35-54, White, Parent (16-17).

SVoDs were considered distinct from linear and BVoDs and more likely to show edgier content – but participants initially struggled to articulate why.

Most participants were familiar with a variety of SVoD platforms, and often had access to several. Netflix was referenced most during discussions, but there were also frequent mentions of Disney+ (although often perceived as more of a children's platform), along with Amazon Prime Video, Apple TV+, and Paramount+. Participants consumed a range of content on these platforms, but often associated them with high-end American-produced "blockbuster" series, alongside films, non-English language content, documentaries, and true crime series.

"From Netflix and Prime I would expect high-end glossy drama and documentaries." Northern Ireland, Male, 35-54, White, Non-parent.

SVoD platforms were perceived as distinct to linear and BVoD services, although participants often struggled initially to articulate the reasons for this. One reason was because SVoDs were seen to offer a broader selection of TV programmes and films. Based on their experiences, many felt that SVoD services also offered edgier content, pointing to examples of more graphic programmes (e.g. containing sex and violence) they could access and the themes addressed. Participants who mentioned this point of difference generally liked it, as they felt SVoDs gave them access to a greater variety of shows, some of which they felt were more appealing than they might find on linear TV. There was limited recognition that some of the content on SVoDs had initially originated from linear TV.

"It's a broad choice [on SVoDs], there's a lot of choice there, so if you want to see something that's a bit disturbing, you can easily find it." North England, Male, 18-34, White, Parent (7-11)

Another reason SVoDs were seen as distinct from linear and BVoD services was because they generally host more international content. Linked to this, some participants started to consider whether this reach was why edgier content might be more common on these platforms. They assumed some of their shows might have been created reflecting different standards in different countries. Indeed, they felt British content tended to be more restrained in pushing boundaries, whereas other countries may be more liberal and open to violence, nudity and other adult themes.

"With British platforms, we have more of a polite background. The stuff we put out is more PC and more filtered. When you go to Netflix, you get more grit and less filtered content." *Scotland*, 35-54, Male, White, Parent (0-3).

After further deliberation, participants were better able to articulate why edgier content might be more prevalent on SVoDs. Participants identified that SVoDs can push boundaries further, given the fact viewers need to seek out content to watch. They started linking it with their experiences of content information (e.g. warnings, ratings, classifications) being more prominent on SVoDs compared to linear TV, and more robust access tools being in place (e.g. PINs, child profiles). These features of SVoDs were seen as enabling greater viewer autonomy in deciding what they want to watch compared to linear. On linear TV, content information and warnings were considered less effective, as someone could accidentally stumble across content if they switched channels and started something part way through. Participants felt they were able to make a more informed decision on SVoD platforms as these measures built their expectation about what they were going to watch. This is explored in more detail in Chapter 4 "What influences participants' views on whether content is acceptable?".

"Some SVoD shows can be quite explicit. Based on violence and sex. You know what you're going to be watching before you watch it. Those shows are what they specialise in." Scotland, Female, 35-54, White, Parent (Child left home).

### 3 Attitudes towards harm and offence

Initially many participants said nothing on TV caused them to be harmed or offended.

Participants typically found it easy to describe how other people might find content offensive or potentially harmful, but many did not think they personally were offended or caused harm by TV content. This is consistent with previous Ofcom research.<sup>8</sup>

Participants often described how they personally were not a "complainer". They explained they would just switch over channels or change programmes if they saw something which made them uncomfortable, and they would be unlikely to report content. A few felt society had become too sensitive and that people were too easily offended, including by TV content. This sentiment was particularly strong among older participants.

"It's all going too far. Some people can be offended by the day of the week you know." South England, Female, 35-54, White, Parent (16-17).

Some participants also thought it was becoming less likely that broadcasters could shock viewers with offensive or harmful TV content because the wider context has changed. They described people as becoming desensitised to more extreme content because it is so commonplace, particularly on the internet, including via social media, and in video games. They felt it was difficult for TV content to push boundaries as far as these platforms, and therefore did not expect to come across content on TV that would be considered offensive or harmful by comparison.

"I think people are becoming desensitised. It's social media and these video games where people shoot people, and they get up and walk away like nothing happened. TV can't show that." Scotland, Female, 55+, Ethnic minority, Parent (Children left home).

Overall, there were mixed views about whether potentially harmful or offensive content on TV was more or less of an issue than in the past. For some, TV was seen to be pushing boundaries in terms of sex, violence, swearing and other graphic content.

"I don't like lots of offensive language. Some of the stand-up comedians, it has actually put me off them, when they start using more offensive language. I'm not a prude or anything like that, but it's becoming more and more acceptable." North England, Female, 18-34, White, Parent (7-11, 16-17).

By contrast, others were concerned that there were more limits on freedom of expression on TV in recent years. Indeed, some participants felt that programming was becoming too sensitive and avoiding addressing certain issues out of fear of complaints. For example, they thought comedians were now less likely to make jokes that used discriminatory language or stereotypes. This was also observed by some in the previous audience expectations research.<sup>9</sup>

"Comedy has become very censored now. I find that sad. It's comedy. It should be light-hearted; we should be able to laugh at anything. Content that's put into the media has to

<sup>&</sup>lt;sup>8</sup> For example, see: https://www.ofcom.org.uk/ data/assets/pdf\_file/0021/225336/offensive-language-summary-report.pdf

<sup>9</sup> https://www.ofcom.org.uk/ data/assets/pdf\_file/0029/193484/audience-expectations-in-digital-world-report.pdf

jump through a lot of hoops before it's deemed acceptable." South England, Female, 18-34, Ethnic minority, Parent (0-3).

Others saw this greater care around discriminatory language and sensitive topics as a positive change which reflected changing social norms and attitudes. For them it meant that relevant audiences were less likely to be offended or harmed by inappropriate content.

"As a society, language is continually evolving and some terms that were seen as acceptable then or now might not be acceptable in ten years times. I'm hoping society evolves and we accept what's right and wrong." Scotland, Male, 18-34, White, Parent (3-6).

Despite not typically seeing themselves as easy to offend when first asked, participants could readily identify content that they or others might find offensive.

Although many participants considered themselves difficult to offend, they could cite a range of types of content others might find offensive. Some also acknowledged that they could be offended if content was extreme. They also emphasised from the outset that the acceptability of this content depended on the context in which it is shown. Types of content that could be considered offensive included: swearing; misogyny; blasphemy; bullying; ageism; homophobia; transphobia; religious discrimination; sexual violence; racism; and paedophilia.

"I think for me offensive is things that break this sense of decency that everybody shares, homophobia, racism, misogyny... all the isms." Scotland, Female, 55+, White, Parent (Children left home).

"Offensive in terms of sexual content, bad language. Then there's all the -isms. I think it just depends on who's watching the show and who it's targeted to, times it's on, what platform. That can all affect what level is considered offensive." Northern Ireland, Male, 18-34, White, Non-parent.

Offence was seen as personal, based on individual beliefs, experiences or characteristics.

Offence was described as subjective and personal, grounded in people's beliefs, experiences, and characteristics. Participants who said that they would not be offended by content could still recognise that others might be. For example, they discussed how they would be comfortable watching someone casually drinking alcohol on TV but recognised that certain religious groups might find that offensive.

Some participants expressed concern that certain groups would be offended by certain types of content more regularly than others – particularly women, religious or ethnic minority groups, the LGBT+ community and people with disabilities. This was based on a perception that TV shows can sometimes stereotype these groups. Again, participants recognised content might offend members of these groups, but they distinguished this from feeling offended themselves.

"I suppose with regard to people with disabilities or gender and stuff like that. Whatever's going on now the comedians will make light-heart of it. People can obviously find those jokes offensive." Wales, Male, 35-54, White, Parent (12-15).

"It is offensive, but do I feel offended? No, because I'm in a lucky position that it's not aimed at me." North England, Female, 18-34, White, Parent (3-6).

"Personally, there's not stuff that I see on the TV that I would find offensive because, I don't know, I feel like usually the butt of jokes are, like, racist jokes or homophobic jokes, and I'm neither of those so they don't really affect me. But they can be quite a shock factor if words do come out." Northern Ireland, Female, 16-17, White, Non parent.

Older generations were perceived by younger participants as being easier to offend than others. Therefore, younger participants thought older people might be more sensitive to being offended by swearing, nudity or sexual scenes as these were considered more common, particularly on SVoD services. This contrasted with the views of some older participants, who were concerned that younger generations were now more sensitive and likely to be easily offended by comedy and archive content.

Even if they were personally offended by themes explored in content, freedom of choice was important to participants. This meant they generally felt most TV content should be available, even if it might offend some people. Based on their own experiences, they thought it was generally straightforward to avoid watching programmes themselves if they did not want to. However, there were limits for some participants, with specific topics becoming less acceptable depending on the genre of the show, for example, some thought comedy about sexual violence or racism went too far.

### Harmful content overlapped with offensive content but was seen to have more direct implications.

Participants linked some types of offensive content to the potential for harm. For example, they discussed whether content might have negative implications of "triggering" or upsetting audiences with relevant experiences of racism, homophobia, or misogyny, for example. There were concerns that including this type of content could also normalise discrimination and encourage viewers to start demonstrating these behaviours themselves. It could then create wider societal harm by creating divisions between groups.

"I wouldn't mind it, but it can be triggering. For people who have experienced similar situations to what's on TV." Wales, Female, 18-34, White, Parent (0-3).

When prompted, participants listed potentially harmful content as depictions of: violence; suicide or self-harm; gambling; negative body image; drug or alcohol abuse; sexual abuse; and racism. It was felt that depicting these behaviours could encourage potentially harmful activities. They also considered misleading or inaccurate health advice as another type of content that could lead to harm (with misinformation about Covid-19 vaccines being cited as a frequent example), as well as discussing the impact of misleading financial advice.

As such, participants recognised there was an overlap between offensive and harmful content. However, concerns about harm focused on content that could have a direct negative impact on people. These impacts included:

Triggering or upsetting vulnerable groups. In line with attitudes about offensive content, there
were concerns that depicting or referencing subjects such as sexual abuse, suicide and racism
could emotionally trigger or upset those with experiences of them. These potential harms were
considered an immediate result of being exposed to inappropriate content.

"My wife, as part of her job, deals with rapes, child pornography, that sort of thing. We watched 24 Hours in Police Custody. With her work, we had to turn that off." *Northern Ireland, Male, 35-54, White, Parent (0-3).* 

"I've had suicide in my immediate family. Seeing any kind of mention of suicide is a trigger for me. It would be more harmful for me." Northern Ireland, Male, 35-54, White, Parent (0-3).

Promoting inappropriate behaviours or harmful attitudes that might encourage young people to imitate them. There were concerns that depicting these behaviours could help normalise them for young people, particularly drug and alcohol abuse. Discussions around the promotion of negative body image focused heavily on the role of reality TV, which was seen to encourage young people to look a certain way.

These harms were perceived as more indirect, potentially conditioning young people to mimic negative behaviours over time. They were also linked to physical harm in impacting a young person's health.

"[Hillbilly Nation] normalises drinking alcohol. We're talking about kids, that's the problem.

Overexposure to stuff like that normalises it." South England, Male, 55+, White, Non-parent.

Younger people did not necessarily agree they were being negatively impacted, seeing themselves as self-aware enough to avoid harm. Some valued shows directly addressing topics such as alcohol or drug abuse, as this made the content more engaging and appealing. That said, they had some concerns about children younger than them (particularly younger siblings) being negatively affected.

"Shows [addressing topics such as alcohol or drug abuse] get so popular that it's hard for us not to see them. They're entertaining because they involve stuff like drugs and stuff.

Shows like that get more popular than just a regular show." South England, Female, 16-17, Ethnic minority, Non-parent.

Most participants thought it was easier to avoid content that made them feel uncomfortable on VoD services compared to linear TV.

Participants frequently discussed ways to avoid content they would be uncomfortable viewing. Simply switching over the channel was seen as the most effective response when coming across something they did not want to watch on linear TV, although there were other approaches they used. This is discussed in more detail in Chapter 4.

On VoD services, navigating content was described as working differently, with it generally considered easier to avoid content participants did not want to see. This was because viewers need to make an active choice to select a show, and as such, participants felt able to assess the likely content of programmes before they did so.

The specific tools that helped participants navigate VoD platforms included content information, such as programme descriptions or age ratings, enabling viewers to select content based on their viewing tastes. It was felt content information and warnings were easier to miss on linear TV if someone is not watching from the start of a programme when they usually feature. They were considered harder to miss on VoD platforms as they are displayed as a viewer decides to watch something. Having appropriate content

information and warnings made many participants more comfortable with having edgier programming (e.g. extreme violence or topics such as sexual abuse) on VoD services.

"If it's on Netflix, it's fine. You have to find it, go and put it on. It's not like you are watching something else, making a cup of tea and it comes on. The people that want to watch it will." Scotland, Male, 35-54, White, Parent (7-11, 12-15).

Some participants thought edgier content needed these warnings to be very prominent with a tone appropriate to the nature of the content. This is to fully inform the viewer of the nature of the content so they can make an informed viewing choice. Reflecting this, examples where the programme description and any warnings were not thought to adequately reflect the nature of the content were generally seen as less acceptable. By contrast, this type of informed choice was considered more difficult to achieve on linear TV.

"I don't think the descriptions 'raunchy and witty' suffice [for *Jimmy Carr: His Dark Material*]. Talking about rape is not raunchy or witty, so it also needs to include that there is extremely offensive material" *Northern Ireland*, 35-54, Female, White, Non-parent.

Some participants also recognised that algorithms are working behind the scenes on SVoDs in particular (they were less sure about BVoDs they currently use). These algorithms were assumed to curate user accounts to recommend shows based on what users had previously watched. However, understanding of how these worked was limited.

"If you go on Netflix, normally it will be your viewing habits. So, if you like stand-up comedy, that programme may be on your genre list, then you would basically come across it." North England, Male, 35-54, Ethnic minority, Parent (16-17).

Participants initially thought these algorithms made it unlikely that they would be shown content which they personally would dislike because the service would learn their preferences. However, as participants considered this further, some expressed concern that after viewing one show that might push boundaries, algorithms might continue recommending shows to viewers which could become progressively more extreme.

## 4 What influences participants' views on whether content is acceptable?

Participants were asked to discuss the acceptability of a series of hypothetical scenarios and clips from content available across different services. These clips had been identified by Ofcom as containing content which might provoke debate about what factors influence viewers' perceptions of acceptability. The hypothetical scenarios were developed by the research team and used in the workshops to explore situations where it might not have been acceptable to show a clip to the research participants or when an example was not readily available.

Reflecting the audience expectations research conducted in 2019 ("2019 Research"), <sup>10</sup> across both linear TV and VoD services, three factors influenced whether content was seen as acceptable or not:

- 1. **Context:** This included the service being watched, how viewers are accessing it, and what was in place to warn viewers or prevent vulnerable audiences or children from viewing it.
- 2. **Content:** This included the words, images, sounds and storyline.
- 3. **Intent:** This included participants' understanding of the perceived intentions behind why the content was created and why a provider has decided to show it.

Recent years have seen an increase in the variety of services being used to watch TV content. This means participants were more familiar with the varying protections available across platforms than they were in 2019. Reflecting this, the context for accessing content has become more prominent in influencing participants' decision making about acceptability.

That said, participants did consider all three factors before coming to a final view on the acceptability of content. This chapter explores participants' reasoning as they considered a range of clips and hypothetical scenarios demonstrating the role each of the three factors played in their decision-making process.

Detailed findings about all the clips and hypothetical scenarios discussed with participants can be found in Appendix A to this report. A description of all the clips used in this research and any accompanying warnings are provided in the methodology section of this report.

Participants recognised the differing context of accessing content through linear TV and VoD services, and this was important in shaping views of acceptability.

Across both linear and VoD platforms, the key focus for participants was whether viewers generally or younger audiences in particular might accidentally stumble across potentially inappropriate content. Edgier content was often perceived as more acceptable if viewers were provided with the required content information to make an informed decision, alongside appropriate measures to protect children. However, the nature of the content information available and the measures in place to protect children was seen as varying between linear and VoD platforms.

<sup>&</sup>lt;sup>10</sup> "Audience expectations in a digital world" (April 2020) is available here: <a href="https://www.ofcom.org.uk/research-and-data/tv-radio-and-on-demand/audience-expectations-in-a-digital-world">https://www.ofcom.org.uk/research-and-data/tv-radio-and-on-demand/audience-expectations-in-a-digital-world</a>

The contextual factors which participants tended to rely on for linear TV remained consistent with the 2019 Research:

1) The timing of a broadcast was the most important factor shaping views of acceptability for linear TV. Participants relied on broadcast timing more than programme descriptions and measures like PIN protections (where available on linear TV platforms) to navigate content. Edgier content was considered more acceptable and more expected after the watershed. Participants felt that this content could be broadcast on linear TV later in the evening, as younger audiences would be less likely to be watching it.

A gradient also remained, with participants describing that progressively more extreme content could be broadcast later into the night. For example, when discussing the graphic nudity in *The Boys*, some felt that this could be shown on linear but only very late in the schedule, and not immediately after the watershed. However, for others, this content was not acceptable at any time on linear because it was too graphic, and participants felt adults would still be shocked if they accidentally came across it at any time of night.

"[The Boys could be on linear TV] very late at night. But not at 9pm. Not a roaming penis on your screen." South England, Male, 18-34, White, Non-parent.

"[The Boys] shouldn't be on normal TV. Maybe on Netflix. I certainly wouldn't search for it." Wales, Female, 35-54, White, Parent (12-15).

Participants continued to support the watershed and most thought it was effective. However, there were concerns that it is becoming less strictly enforced, with some participants claiming to have seen inappropriate broadcasts before 9pm. This was often in reference to soaps.

"I watched a soap. They were all shouting, swearing, someone trying to kill someone. That was at 8.30." South England, Female, 35-54, Ethnic minority, Parent (7-11).

They also recognised that broadcast timing and the watershed was limited to linear TV and different protections were needed to protect children from the same content on BVoD platforms. This was particularly important as participants expected younger people to be using these platforms more often than they watch linear TV.

"The watershed's almost dead now, isn't it? You don't watch TV programmes when they're on." Scotland, Male, 35-54, White, Non-parent.

2) Participants wanted sufficient content information or warnings at the start of linear programming so they could make informed decisions about whether to watch something. As in the 2019 Research, participants considered the title of the show and any accompanying description to be helpful indicators of what to expect when deciding to watch something. If the programme contained edgier content, then they also wanted a clear and accurate content warning with an age rating before the programme started so they could make an informed decision.

For example, some participants felt the *Happy Xmas (War is Over)* would have been more acceptable to broadcast on linear TV if the channel had warned viewers of the upsetting images, as they felt these were unexpected on a Christmas music channel.

"You do get similar clips [to *Happy Xmas (War is Over)*] on the news where they show warnings beforehand. I think if they showed a warning at the start saying it contains scenes of a nature that people might find upsetting then it would be more okay." *North England, Female, 18-34, Ethnic minority, Parent (3-6).* 

Despite wanting content warnings, participants were concerned that they can easily be missed if someone is flicking through linear channels and does not watch a programme from the start. Given this, they felt that even with clear warnings, edgier content would still need to be shown post-watershed on linear TV. Some felt that any relevant content warnings should appear whenever you click onto a linear channel, even if a programme is already underway. Although warnings can also be included in electronic programme guides, this was not discussed by participants.

"If you click on halfway through on linear, there should be something that comes up that says you are about to watch something extreme." South England, Female, 55+, White, Parent (Left home)

3) The reputation of the channel also indicates what to expect on linear TV. Based on their experience, participants described finding different types of content across linear channels. They believed that edgier content would be on Channel 4 or 5, or smaller channels harder to find in their TV Guide. They considered ITV, or particularly the BBC, to be more "family friendly" and less likely to broadcast extreme content.

"I think Channel 4 are more likely to deal with adult issues and give the context. Whereas the BBC would avoid it all together." *North England, Female, 55+, White, Non-parent.* 

Participants viewed the context for VoD services as distinct from linear TV. They described navigating content and deciding whether it was appropriate for them or their family using different contextual criteria. In particular, viewers were considered to have more autonomy in deciding what to watch compared to linear.

The contextual factors which participants tended to rely on when accessing VoD services were as follows:

1) Self-selection on VoD platforms. Participants thought the active choice involved in consuming VoD content made it less likely that viewers could accidentally stumble across something inappropriate without being adequately warned. This is because viewers need to make a decision to select a show on a particular platform and would need to engage with any content descriptions or warnings before beginning to watch.

"They're telling you from the offset, some scenes may not be suitable for all viewers, but if you still want to sit here and watch it, we warned you. It's up to you." *Northern Ireland, Male, 35-54, Ethnic minority, Parent (12-15, 16-17).* 

As explored in Chapter 2 "Audience behaviours and platform expectations", participants recognised they consume VoD content differently to content they might watch on linear TV. They are more likely to seek out shows they want to watch and more consistently pay attention once they have decided to watch it. On the other hand, they considered that when watching linear TV, viewing can be more casual. Participants described being more likely to leave linear TV on in the

background, which meant they could be shocked if they came across something inappropriate. As a result of these differences, participants assumed – and generally accepted – that VoD services could push boundaries further in terms of edgier content.

Participants often spoke about self-selection when considering the acceptability of edgier clips such as *The Boys, The Punisher* or *Jimmy Carr: His Dark Materials*. While views varied, many participants thought these were more appropriate on VoD services but not acceptable on linear TV because viewers need to seek out the content on VoD. However, there were limits to this for some participants. For example, a few felt the content in the *Jimmy Carr* clip went too far even for VoD services. They argued it should not be available anywhere because of the potential societal harm they thought it could cause by normalising sexual abuse.

"I don't think the Jimmy Carr clip should be on linear TV. There's a place for everything, but it needs to be a place you come across when you search it. I didn't like it. I wouldn't be paying to watch it. I wouldn't expect to come across it by chance. If you want that, you look for it, you find it, you enjoy it. That's up to you." Wales, Female, 35-54, White, Parent (12-15).

2) With no broadcast timing on VoD services, viewers tended to rely on tailored children's profiles and PINs to protect their children (particularly younger children). Indeed, they often felt these VoD protections were more robust than those available on linear TV, describing them as better at limiting content available to children and preventing them from watching anything inappropriate. If these protections are used appropriately, then participants tended to think VoD services could have edgier content available because the viewer or parent/carer is equipped to take more responsibility. Age ratings also played a role in informing parents' and carers' choices. The effectiveness of these ways of protecting children are discussed in more detail in Chapter 6 "Protecting Children".

"I don't want my kids just accidentally turning on normal TV and capturing the wrong moment. If they go on-demand and I give them the password as a parent, or they figure it out, that's my fault and I take the blame as a parent but them switching on normal TV to something as bad as *Jimmy Carr* or that *Punisher* scene. I think that should be pin protected and then it can be a parent's choice." *North England, Male, 35-54, White, Parent* (16-17).

Parents often described imposing their own "watershed" for timing their viewing when watching content on VoD services. They felt informed enough through content warnings, age ratings and trailers to decide whether they needed to wait until their children were in bed to watch a show.

"I think with subscription TV you can choose when to watch something. I would wait until my son went into bed. Whereas if I went on TV and Coronation Street was on, I would have no control over that as I did not know it was coming." North England, Female, 18-34, White, Parent (3-6).

3) Viewers have more opportunity to engage with content information, warnings and trailers on VoD services. Typically, descriptions and warnings on VoD platforms were felt to be more effective than those on linear television. Participants described viewers being presented with details about a programme when deciding whether to watch something. They thought this enabled them to make a more informed decision than for linear TV. Given their reliance on these details, they emphasised that it was important that content information and warnings were accurate and prominently displayed.

"SVoD warnings are pretty strong. They go very in-depth. Their warnings are definitely up there in black and white before the programme starts. Most people who watch it know what things will be brought up. You'll know what to expect." *Northern Ireland, Male, 35-54, Ethnic minority, Parent (12-15, 16-17).* 

Reflecting this, participants thought there was opportunity for content information and warnings to be more detailed on VoD platforms because viewers can decide how long they want to engage with them. The potential for warnings was seen as more limited on linear TV, where they can often be mentioned only briefly at the start. For example, while most participants felt the *Jimmy Carr* clip pushed the boundaries of what is acceptable, many argued that Netflix provided enough content information and warnings to build viewers' expectations.

"I think they've given you every possible warning that they can [on the *Jimmy Carr* clip]. They're doing everything they can." Wales, Male, 35-54, White, Parent (12-15).

Participants also described often viewing trailers before deciding to watch content on VoD services. They felt these trailers were typically sufficient in setting viewers' expectations about the type of content. In their experience, 'suggested' trailers (e.g., ones which were promoted or recommended by the service) were a good way of finding new shows to watch as they were assumed to be based on their viewing history, alongside popular shows with mass appeal.

"A lot of shows now that have pretty good trailers. You get a gist of what you're going to watch." Northern Ireland, Male, 35-54, White, Non-parent.

However, participants were also conscious of trailers playing automatically on some VoD services, because the element of choice was removed. They were familiar with this happening, and a few could reference occasions when they were shocked by a trailer's content. Most thought trailers should avoid showing the most extreme content in case it went beyond the viewer's preferences. However, they expected viewers should also be able to judge the programme's tone from a trailer and decide whether it was appropriate.

"It's happened with me on Netflix with *The Witcher* being advertised. It was a quiet scene and then there was someone killing a monster with a sword. I was terrified. I did end up binge watching all the seasons though." *Northern Ireland, Male, 18-34, White, Non-parent.* 

4) The reputation of the service and its perceived audience is important on VoD services. Participants thought it would be less acceptable for edgier content to be available on services perceived as primarily targeting children, such as Disney+. They felt more children using a service meant there was an increased chance of them being exposed to edgier content. For example, they were surprised that *The Punisher* was available on Disney+ given its extreme violence and superhero branding which could appeal to children. However, as already explored, they generally trusted the protection offered by children's profiles on SVoD services, particularly for young children.

"I was shocked [by *The Punisher*]. It needs to be differentiated. I thought Disney, it's kids. I wouldn't want a child to come across that." *North England, Male, 35-54, Ethnic minority, Parent (16-17).* 

Participants thought it was acceptable for BVoDs to host content which might push boundaries further than would be appropriate on their associated linear channels. This was discussed in context of the *Little Britain* clip, which most recognised as racially offensive, being available on BBC iPlayer. Most agreed this was not acceptable on linear TV and some questioned whether this content should be available on any platform. However, some participants thought making it available on a VoD service was more acceptable as viewers who wanted to watch such content could seek it out and do so after being appropriately warned.

"I think we might be all conditioned to expect certain things from each channel you view. I would expect to see that on Netflix, I wouldn't necessarily expect to see it on iPlayer, and certainly not on linear TV." Scotland, Male, 55+, White, Parent (Child left home).

Despite being more accepting of BVoDs pushing boundaries compared to their associated linear channels, participants did not expect BVoDs to push boundaries as far as SVoDs. This was because BVoDs were still generally viewed as extensions of their relevant linear services, as discussed in Chapter 1. When BVoDs made content available that was edgier than their associated linear channels, opinion was often split on whether it was acceptable. This is discussed in more detail in Chapter 6 "The acceptability of archive material".

Across linear and VoD services, the specific nature of what was included in the content also shaped acceptability.

Beyond the context of how they are accessing content across both linear TV and VoD services, viewers also assessed the specific nature of what was being shown. As discussed previously, participants generally saw edgier content as more acceptable on SVoDs, and less acceptable on linear TV, but what was shown was also important in shaping views. When assessing content participants focused on:

**The strength of the material, including the extent to which it was considered gratuitously graphic or offensive.** Extreme graphic content, including violence and sexual abuse, was more likely to make participants feel uncomfortable. For example, a clip from *The Punisher* showing a fight-scene where a man's face was dragged across broken glass was seen as gratuitously violent by some participants, and they stopped watching the clip during the research. Likewise, the nudity and sexual scenes depicted in *The Boys* were perceived as excessive by some. However, there was greater acceptance of more subtle, suggestive content, such as in *The Handmaid's Tale* clip, which used music to build tension without actually depicting any violence.

"[When watching *The Punisher*] I'm thinking to myself, *'Wow this is quite graphic'*. The actual scene, in a fair ground. It's in a place where children are supposed to be enjoying themselves, and there's carnage going on. The scene was really graphic." South England, Male, 35-54, Ethnic minority, Parent (16-17).

Very offensive or discriminatory language was also seen as less acceptable, especially if used consistently and without warning. It was felt that this graphic content was more acceptable on VoD services compared to linear TV given the context of viewers deciding to watch it once they had been appropriately warned.

The genre. Participants considered whether content was appropriate for the genre. Some themes were viewed as less acceptable in a drama or comedy where they could be glorifying or trivialising a topic. For example, in the hypothetical scenario of being shown someone taking heroin, this was perceived as generally more acceptable if it was as part of a documentary (e.g. detailing real life experiences) where it was seen as raising awareness of issues, as opposed to in a drama. This was seen as relevant across both linear TV and VoD services with little distinction.

"I think sometimes you need to be made uncomfortable with a documentary and things, but if someone was shown taking heroin for fun, in a park, that's obviously far more offensive. There are so many layers to it." Wales, Female, 35-54, White, Parent (7-11, 12-15).

### Why content was perceived to have been shown also influenced views.

When judging the acceptability of edgier content, participants also considered its perceived intent. Content was viewed as more acceptable if participants felt its purpose was to educate the audience or raise awareness about an important issue in society. For example, when considering the hypothetical scenario of the use of the word 'nigger' being used in a historical drama, <sup>11</sup> some participants reasoned that this reflected the reality of that period in history, compared to it being used excessively in music where some struggled to identify its purpose.

"I'm first generation. I wouldn't find it offensive because it's educating people, you know, this is how people treated other people. I think to me because it's historical and it's factual I wouldn't find it offensive personally." North England, Female, 35-54, Ethnic minority, Parent (7-11).

For this reason, participants were typically more accepting of content which documented "real life" experiences over completely fictional scenes. For example, while shocked by the scenes depicting wartorn countries in the *Happy Xmas (War is Over)* music video, they thought it would be acceptable on linear TV, compared to the graphic violence in the fictional TV series *The Punisher* which they thought would not. Both clips made participants feel uncomfortable, but they were more accepting of the former because its perceived motivation was to evoke sympathy and raise awareness for victims of war, as opposed to purely for entertainment purposes.

"The reality of that video, compared to the fictionalised portrayal of violence. I think we need a bit more balance. We are becoming inured to fictional violence to TV, and it is getting more extreme." South England, Male, 55+, White, Non-parent.

Participants also disliked content which they perceived as being potentially offensive or harmful without an obvious reason. This was touched on when discussing the use of offensive language in comedy. Some thought if used sparingly for a punchline on a VoD service, then the shock value of the language can add to the comedic effect. However, if used consistently throughout a show then they felt it lost its impact and became inappropriate and less acceptable. This was also linked to the fact that if a child or someone vulnerable was in the room then they can respond to it being used once, but it becomes

<sup>&</sup>lt;sup>11</sup> This was introduced to participants in the stimulus as: A historical drama about slavery where someone uses the "N" word.

impossible if happening repeatedly. Most participants did not expect swearing to be used at all prewatershed on linear TV.

"I think if it [c\*nt] is in the right context in a comedy programme. Sometimes a real funny context is when you're not expecting it and then suddenly it comes. I think that can be quite hard-hitting." North England, Male, 35-54, White, Parent (0-3).

Content became less acceptable across platforms if it was seen by participants to be making light of serious or sensitive topics or targeting groups who were perceived to be vulnerable. For a few participants, this was when content was deemed to have crossed the line to become unacceptable and not suitable to be available on any services. For example, the *Jimmy Carr: His Dark Materials* clip which joked about rape and the racial stereotyping in *Little Britain* were both considered unacceptable by some. They were seen as potentially triggering for those with relevant experiences, and risking causing societal harm by normalising these behaviours.

"I think there's a big difference when an authority satirises a disenfranchised group within society that doesn't necessarily have a voice to poke back at them." South England, 18-34, Female, Ethnic minority, Non-parent

### 5 The acceptability of archive content

The range of considerations participants weighed up when judging content acceptability is described in Chapter 4 "What influences participants' views on whether content is acceptable?". This chapter builds on that discussion and picks out the specific considerations (in terms of context, content and intent) used by participants when accessing archived content on both linear and VoD services.

### Participants recognised that what is acceptable on TV has changed over time.

Participants recognised that both linear and VoD services offer a mixture of modern, contemporary programming and older content, some of which may have been made and originally broadcast many years ago. Most participants were familiar with older "archive programmes" sometimes being repeated on linear TV, either as a one-off special or more regularly on channels such as Gold or ITV4. There was also some familiarity with this content being archived on VoD platforms, with spontaneous mentions of platforms such as Britbox or older films being available on Disney+.

Participants were shown archive content across three clips which are either still available on VoD services or have been broadcast on linear TV. These included footage from *Little Britain* (first broadcast in 2002 and available on BBC iPlayer), *The Aristocats* (released in 1970 and available on Disney+), and *Happy Xmas (War is Over)* music video (released in 2003 and recently shown on linear TV). Their opinions towards each of these clips individually are explored in more detail in Annex A. Discussion was primarily in the context of the depiction of language and behaviours based on racial stereotypes in the first two clips, which shaped participants' views on archive material more generally.

Throughout the discussion of archive content participants often reflected that what is acceptable in society has changed rapidly, even during the past decade. They acknowledged that problematic themes such as misogyny, homophobia and inappropriate sexual references were more often normalised in older content. Some described often being shocked when rewatching shows they used to enjoy. For example, they spontaneously mentioned content they now considered inappropriate and potentially offensive in shows such as *Friends* and the *James Bond* films. Shows from the 1970s such as *Love Thy Neighbour* and *Till Death Us Do Part* were also a common benchmark for inappropriate racial references.

"People's attitudes have changed, even *Friends*. It can be quite racist and homophobic. In the '90s you didn't pick up on it, but you can see how people today would get offended by it." *South England, Female, 18-34, White, Non-parent.* 

"The risqué jokes wouldn't get past the censor now. I watched a *James Bond* film. It was so sexist. I was laughing for the wrong reasons. I think it was on ITV. What we found funny 20 years ago, you wonder, what was that about?' *Wales, Male, 55+, White, Non-parent.* 

If they felt the content was not obviously offensive to them, then participants were more likely to want to continue to access it. This was because they had previously enjoyed these programmes and felt nostalgic about them, justifying them as 'of their time'. This was evident when discussing *The Aristocats* which many had watched as children. Even though many felt its stereotyping was offensive, they took into account that it was from the 1970s and only briefly shown in the clip. They did not assume the

perceived intention of the film was to cause offence; instead, they thought societal attitudes have since developed in a way that makes the offence obvious to them now. However, the potential offence of the scene was not universally obvious, with some, particularly older participants, struggling to identify what part of the clip may be problematic to some viewers.

"I see a lot of things that I'm like, woah, I wasn't aware as a child. Aristocats, I feel like that is the only line of the film that isn't okay, unless I'm mistaken ["Shanghai, Hong Kong, Egg Fu Yong! Hya ha ha ha ha ha! Fortune cookie always wrong! Hya ha ha!"]. I have no issue with my child watching that." South England, Female, 18-34, Ethnic minority, Parent (0-3).

On the other hand, participants were less accepting of archive content which included language they viewed as clearly discriminatory, particularly if the offence was used as a joke device. This again was linked to the perceived intentions of the clip. If it was considered to purposefully target vulnerable or minority groups, this was much less acceptable.

Participants also considered whether the content could have been considered offensive at the time it was created. Overall, this led to them finding the *Little Britain* clip unacceptable for broadcast on linear TV, despite having been made relatively recently. Some even questioned whether it should be made available at all on any platform. Others acknowledged they still found the specific clip funny but felt they could not openly admit to that without being judged.

"I think lots of the themes are quite outdated. If you want to watch it, then go ahead and watch it. But it's not something we need to promote on linear TV. It could offend people. It's not that hard to be offended by it. It's not in the interests of society to watch those themes anymore." Wales, Female, 18-34, White, Parent (0-3).

"Personally, I think that type of material is racist, but I also have a really dark sense of humour, so I'd be lying if I said I didn't laugh. I'm going to be honest. To me, I don't like the censorship of comedy." South England, Male, 18-34, Ethnic minority, Non-parent.

Some older participants had complex views about these issues. In their view, by reflecting social changes, TV content had not necessarily changed for the better. This was because although they recognised that some offensive, discriminatory content and stereotypes were unacceptable they were also concerned that in some respects "politically correct" culture had gone too far and was starting to limit freedom of expression. At the same time, however, they also expressed concerns about what they saw as an increase in swearing as well as sexual and violent content on TV.

"There's definitely more swearing in programmes, compared to when I look back to the eighties." Wales, Male, 55+, White, Parent (12-15).

"Interestingly, in 70s or 80s, there was a lot less political correctness than there is now. You think 'oh my god how did they get away with that?' I think that's because of the society, people are a lot more careful about what's said and how it's said. That's changed." South England, Female, 35-54, White, Parent (16-17).

There was split opinion when considering how archive material should be treated.

Participants were divided over appropriate protections for archive material. They reflected on:

• Warnings. These would appear before viewing archive content and would warn viewers about any inappropriate themes it might address and explain why it was still available. Such a warning is shown before *The Aristocats* on Disney+, which viewers cannot skip. This was seen as valuable on both linear TV and VoD platforms (although warnings were generally seen as more effective on VoD services).

Overall, participants valued these warnings if platforms explained why the content might now raise issues and sought to educate audiences about how society has changed. Parents also appreciated when they were made aware from the outset and could prepare for any difficult discussions with their children.

"I think the warning is really good. I like sitting my kids down and educating them on things that were acceptable and aren't now. It sparks a conversation. They're classic films and may have errors in them. It's great to learn from these things." South England, Female, 35-54, White, Parent (7-11, 16-17).

Reflecting the importance of properly informing audiences, participants felt a similar warning should be available before watching *Little Britain* on BBC iPlayer. They thought the racial stereotyping in this clip was more offensive than *The Aristocats* and felt it needed to be flagged with more detail to viewers. There was concern that the warning which had been provided of "contains discriminatory language" was too vague. They also wanted a clear age rating on the content, which they felt should be at least 15. They also thought the provider should explain why this content was still available in the warning.

"I think they could do what Disney+ did with *The Aristocats* and make it a fuller warning explaining why they've kept it." Scotland, Female, 55+, White, Non-parent.

Others disliked enforced warnings and saw them as unnecessary, especially for children's content. They thought children were unlikely to read or understand them. Not everyone thought *The Aristocats* warning was necessary for what they saw as a very brief incident in the film. There were also concerns about whether such warnings might encourage audiences to try and find things offensive which they otherwise might not have noticed.

"The warning was ridiculous. It's unnecessary. People are now going to watch it and look for something to be offended by." North England, Female, 18-34, White, Parent (3-6, 7-11).

**Removing scenes.** Some participants thought warnings on their own did not go far enough. They argued that once the platform had acknowledged the content was offensive, they should remove the problematic part. This was seen as especially relevant for *The Aristocats*, where they thought the scene was only brief and so could easily be removed.

"If they can be as brazen as put an apology at the beginning of it, why show it if you'll take bits of it out. Why apologise for it? Just don't show it. That scene? It shouldn't be available. You've accepted it's not acceptable." Northern Ireland, Male, 35-54, Ethnic minority, Parent (12-15, 16-17).

These participants thought that if content could be seen as very offensive, then it should not be shown on any platform, including both linear TV and VoD. When discussing *Little Britain*, participants were told that some scenes including actors performing in make-up to portray a

different ethnicity had been removed, which led them to question why other scenes had not been treated in the same way if they were also openly discriminatory.

"If they've taken out the bits that are really offensive, why do they have any bits that people could still find offensive?" Northern Ireland, Female, 35-54, White, Parent (7-11).

However, others thought these scenes should still be included with appropriate warnings for viewers, and that this might be better suited to a VoD service or specialist linear channel. They were concerned that removing them could border on censorship. Some thought showing them had an educational value by reflecting societal attitudes at the time. For them, removing scenes would be to pretend these attitudes did not exist. There were also concerns about where this could lead to by setting a precedent, as they had already acknowledged offence was subjective and it would be impossible to please everyone.

"We have to live with it. You can't take every programme off that's offended someone along the way. You will end up watching blank screens in the end. Just a simple message like that, yes there is something there that is incorrect, offending someone previously, but it's there for everyone to see." Wales, Male, 18-34, White, Parent (0-3).

### 6 Protecting children

Parents were seen as ultimately responsible for protecting their children, but service providers were thought to have a role in making this easier.

Ultimate responsibility for protecting children from inappropriate content was seen to lie with parents or carers. However, most participants acknowledged that it is increasingly difficult to monitor all the content children are watching, and service providers need to make it easy with effective content information and controls.

"I think it's the parents, but they need the tools to be able to control it, and we don't always have those." South England, Male, 55+, White, Parent (Child left home).

"I think it's more on the services than the parents. If they're not showing or finding a way to resolve around anyone accessing it, then it's not really on the parents, I think." Wales, Male, 16-17, White, Non-parent.

The main role participants wanted service providers to play was ensuring available tools were useful and effective. This meant age ratings and warnings that accurately reflected the content, and user profiles that removed inappropriate content for children. Participants felt this would reduce the need for ongoing parental monitoring.

"The likes of Netflix, if you decide you want a certain age category, you've got to put trust that it's likely to be suitable." Scotland, Female, 35-54, Ethnic minority, Parent (12-15, 16-17).

"The main one is the parents or guardians to be solely responsible for what that child watches, but then the...[BBFC] is who is giving that rating for what's suitable. They have to give people that basic understanding and heads up." North England, Male, 18-34, White, Parent (3-6).

Parents said that they often use TV as a distraction for their children to keep them entertained while they are busy elsewhere. They do not always have the time to consider every show and so they need effective tools to support them in ensuring their children can navigate content safely. They also wanted programme creators to keep content at an age-appropriate level, particularly when targeted at children.

"The show makers themselves [have responsibility] because when people put shows on for their young kids, you hope the creators keep it at that appropriate level as I'm off cooking dinner." Wales, Female, 35-54, White, Parent (12-15).

Content perceived as inappropriate for children mirrored topics considered potentially harmful or offensive for adults, but participants' main concerns varied depending on the likelihood of different children viewing such content and the child's age.

Content considered most problematic varied dependent on children's age. For example, themes flagged as more concerning for later teens included the promotion of an unhealthy body image, drug or alcohol abuse, sexual scenes, discriminatory language and self-harm and suicide. All of these themes were also considered inappropriate for younger children. However, participants felt young children were less likely to be exposed to them because parents would have more oversight of what they were viewing.

"My older son is an athlete and there is a lot of pressure to have this perfect body, and a lot of shows based around diets. How to lose a stone in seven days. I think that applies to boys and girls, that whole sort of diet and gym culture, it's in your face." Scotland, Female, 18-34, White, Parent (7-11,12-15).

Participants were typically worried about glorifying and encouraging these behaviours among a susceptible audience. They were considered mature themes that teenagers might want to see included in programmes, but that they were not necessarily ready to fully understand. Concerns such as body image and drug or alcohol abuse were sometimes linked to reality TV.

"Programmes like Love Island are massively superficial. They give the wrong impression across. Yet the way they are made, marketed, the publicity that surrounds it, the colour, the age group, it is attracting a younger and younger generation who should not be watching it, and it is giving a negative message." *Northern Ireland, Female, 35-54, White, Non-parent.* 

16-17 year-old participants recognised the potential negative influences in these types of programmes and voiced concerns around how these might be harmful for young audiences. However, this concern was focused more on their younger siblings than themselves. 12 16-17 year-old participants considered themselves mature enough to make informed choices and consume content in a way that avoided negative impacts on them personally. They also felt that, while uncomfortable viewing, addressing topics such as self-harm or suicide were important to raise awareness around these issues.

"My younger sister watched it [13 Reasons Why]. She was bawling her eyes out the whole way. She didn't like it. But for me that is quite educational." Wales, Female, 16-17, White, Non-parent.

When it comes to younger children, participants (particularly parents) were more concerned about them being exposed to horror films and content with violence, swearing or sex. These might upset or scare younger children, cause them to imitate problematic behaviour or lead to difficult conversations for parents. For example, when viewing the *Erax* clip, participants were far more concerned about the impact it would have on young children and questioned its acceptability. By contrast, they thought it would be seen as light-hearted and funny by older children.

"It really scared me. I wouldn't sit down with my 4 year-old daughter to watch this. It would give her nightmares." *Northern Ireland, Female, 35-54, White, Parent (12-15, 3-6).* 

On linear TV, nearly all participants were supportive of the watershed as a way to protect young children from inappropriate content. However, as explored in Chapter 4, there were some concerns that it is becoming less strictly enforced. As a result, some discussed whether PINs could be used more widely for linear TV broadcasts.

Parents were generally reliant on the reputation of channels and the watershed to protect young children when watching linear TV. As discussions developed, parents described how they also apply additional protections on VoD services to further protect their children. These more child-specific protections

<sup>&</sup>lt;sup>12</sup> This is not an unusual finding in qualitative research with teenagers, especially when being interviewed in friendship triads where they are less likely to express concern for themselves.

included child profiles or PINs which were seen to limit the choice of content available to children and protect them from inappropriate content.

More trust was placed in broadcasters and SVoD services against the backdrop of the wider internet being perceived as far riskier for children.

Most participants felt that younger generations were "growing up faster" because of the rapid advances in technology and entertainment. They reasoned that access to the internet, where it is harder to supervise children, has exposed them to more mature themes than would have happened in the past.

Rather than TV content, parents were far more concerned about what children could be exposed to on the wider internet or video sharing platforms (VSPs), such as TikTok or YouTube, as these were considered to have less regulation or curation by media providers. Parents' experience was that there is more extreme content available on the internet, with some participants describing experiences of being recommended sexual content on services such as YouTube straight after watching something child-friendly.

"There's stuff like *Peppa Pig* porno on YouTube which comes up automatically." South England, Male, 18-34, Ethnic Minority, Parent (0-3).

They also had little confidence in the protections available on VSPs or the internet more widely. In their experience this did not always filter out all inappropriate material, and children were still at risk of being exposed to potentially harmful content. For example, the *Hillbilly Nation* clip on YouTube, which had limited accompanying warnings, was seen as potentially harmful in encouraging viewers to mimic behaviours which could physically hurt them. Likewise, young users of platforms like TikTok also described feeling uncomfortable with some of the content that is recommended to them, even with age restrictions in place.

"People's accounts will be age restricted. But TikTok's very messed up and they'll agerestrict stuff that doesn't need to be and there's stuff that comes up on my For You page that I never wanted to see, that I'm shocked hasn't been taken down. It's actually crazy." Northern Ireland, Female, 16-17, White, Non-parent.

Participants also recognised that it is harder for parents to monitor what their children are accessing on the internet, because they can watch it privately on their phone in their bedrooms. Some described it being harder to identify a viewing history on personal devices. Participants also discussed how children can often be more confident with technology than their parents, allowing them to overcome protection measures or even hide the content they are watching. By contrast, younger children typically watch TV in a communal area where parents can see and monitor it.

"TVs are normally communal areas. Not like small devices where you can't see what people are watching in their bedrooms." Wales, Female, 35-54, White, Parent (7-11, 12-15).

Most parents trusted protections to be effective for young children across services, although the perceived value of such protections varied.

Most participants were aware of the protections available across VoD services, with parents saying they used them to protect their young children from being exposed to inappropriate content. Parents could give very few examples of their children coming across inappropriate content on these platforms.

The protections that participants considered to be most effective for young children were:

Child profiles. Participants recognised that the amount of content available on VoD platforms made it harder for parents to keep on top of what is appropriate for their child. Child profiles were seen as good way of filtering out riskier content and reducing the burden on parents. Those who used them described having profiles set up for different children, each with relevant age restrictions. They thought these were reliable in only allowing access to programmes appropriate to their child's age. These kinds of profiles were widely used, with parents often saying they felt comfortable leaving their young children alone to decide what to watch themselves on this basis.

"If they're on Netflix on their profile or their Disney+ profile I feel they're safe. Maybe that's naïve." Wales, Female, 35-54, White, Parent (7-11, 12-15).

PINs. These gave parents an extra element of control as gatekeepers to what their children are watching. They were seen as an additional check because if their child wanted to watch something that was pin protected, this would prompt parents to look more closely at the description and assess whether it was appropriate. It also enhanced the protection offered by profiles, as parents could prevent children logging into adult profiles. There were more concerns about PINs being less effective for older children (explored in the next section).

"The most effective one is a PIN code to access different parts of TV. That way if your child is watching it, they have to come to you and ask if they can watch it." Scotland, Male, 35-54, White, Parent (Child left home)

While participants generally still valued and appreciated other methods for protecting children, they thought their effectiveness varied:

Content descriptions and warnings. These were seen as useful indicators for assessing what
might be in the programme. However, participants said they did not always read these, especially
if the content was readily available on a child's profile or part of a series they were already
watching.

"It's up to us to see the description, and read it, before we allow them to watch the programme. But it's just not something that we always do." North England, Female, 35-54, Ethnic minority, Parent (7-11).

Participants also worried that descriptions sometimes focused on promoting the show rather than warning about the content. For example, they did not think it was adequate for *The Punisher* on Disney+ to be described as a "superhero" and "action-adventure" programme, which they perceived to be appealing to children, given the extent of the violence depicted. The concern surrounding this clip is explored in detail in Annex A.

"It doesn't say enough about the violence. It doesn't say somebody's going to get beaten until their face falls off." South England, Female, 18-34, Ethnic minority, Parent (0-3).

• Age ratings. Participants generally appreciated a clear age rating as they thought this gave a quick indication about suitability of the content for children. However, they also recognised these ratings as having limitations, given differences between children of the same age. As such, some argued it was difficult to summarise suitability in a single age rating. Parents also thought that

age ratings could differ from what they, as parents, considered suitable for different age groups. They described still needing to exercise their own personal judgment on suitability, including scanning the content first, fully engaging with descriptions, watching trailers or even researching the show online beforehand.

"The age thing has shifted. Some of the things that are [suggested as] okay for 12-year-olds to watch, you think, I don't want 12-year-olds to watch this content. Some of the films and programmes that come on, I think there's been a change in way of thinking and what is now age appropriate." South England, Female, 18-34, White, Parent (0-6).

In terms of the specific type of age ratings used, participants views were mixed. Most preferred the familiarity and standardisation of the British Board of Film Classification (BBFC) ratings, which, in their experience, had proved reliable. For them, the broader ratings such as U and PG, would act as a prompt to read the content information more closely and decide whether it was appropriate for their young child. They felt it put the onus on the parents and gave them more autonomy to decide on whether content was suitable for *their* child.

"PG is the better [than non-BBFC ratings]. As a parent you're aware of your child's likes and dislikes, what you do and don't want them to see. You're better placed to make that decision than a 9-year-old is." South England, Female, 18-34, Ethnic minority, Parent (3-6, 7-11).

However, a substantial number did prefer age rating systems that gave greater granularity and were more explicit about the age of child the content is suitable for (e.g. 0+, 6+, 9+). They felt it made it easier to make decisions about what their children should be able to view. Small age differences at younger age categories were considered important by parents as they recognised, during these years, children develop quickly. This meant that for these participants these type of age ratings provided more reassurance about the suitability of a particular piece of content for a particular age of a child than a PG ("Parental Guidance") rating.

"I think PG is very broad. Some things that are rated as PG aren't suitable for different age groups. It's better to have a clear age rating. If I start something with my 2-year-old and I decided I don't want him watching it, often a tantrum ensues." Northern Ireland, Male, 35-54, White, Parent (0-3).

However, others did not find specific age ratings helpful in distinguishing what was appropriate for their nine year-old versus a six year-old. They described these decisions as being based on the individual child, again emphasising parental responsibility, with tools like age ratings having only limited usefulness.

"Ridiculous. It's just too close together. It's either a children's film or not. There's not much difference between a 6 year-old and a 9 year-old, it's far too close." North England, Female, 18-34, White, Parent (3-6, 7-11).

Age check boxes. These boxes appear before content starts playing and ask the viewer to confirm whether they meet the age requirements for the programme by selecting a tick box. Most participants were not against these and thought when watching with young children, they helped make the age rating more obvious to parents. However, they were considered less effective than other protections. When watching unsupervised, they thought these would be difficult for younger

children to understand (and so they would likely tick 'yes' to proceed) and easy for teenagers to get around if they wanted.

"The age checking, they just ask, Are you over 18? You can say yes and carry on watching. I don't think that's particularly useful." *North England, Female, 18-34, White, Parent (7-11, 16-17).* 

#### Protections were considered to be less effective for older children.

Participants felt that even the most effective protections for younger children were much more limited for protecting teenagers. For example, child profiles become less appropriate as children grow up and want to start watching a wider variety of content. Parents often described finding it tricky to decide whether to give their teens access to a "non-child" account as they worried about them being exposed to inappropriate content.

"You either have to jump into the adult account or the child account. Let's say they're 15. They'll be bombarded with 18 films on an adult account. But at the same time, the alternative is they have to sit down and watch Cocomelon on Disney." Scotland, Male, 35-54, White, Parent (7-11, 12-15).

Similarly, there were concerns that if teenagers watched an inappropriate show on their own VoD profile, then algorithms would be likely to suggest similar content which could get more extreme. Parents also explained that when teenagers have their own profile it removes the ability for them to passively monitor what their child is watching when they happen to be on the same account. This requires parents to actively select the profile and browse their viewing history, which they were not always comfortable doing out of respect for their child's privacy. Consequently, while individual profiles were seen to protect younger children, they were thought to bring risks for older children who would likely then have access to an adult account.

"I'm not too sure what he's watching sometimes. *The Walking Dead*, or *Squid Game*, and all this stuff. We're not allowed on his page, sort of thing, because it ruins his algorithm, whatever that means." *Scotland*, *Female*, *55+*, *White*, *Parent* (12-15, 16-17).

PINs were also seen to become less effective because teenagers are often either told them by their parents, learn what they are or once they have become aware a show exists and they cannot watch it, find other ways to watch shows such as downloading them from pirate websites. This was seen as more of a concern because of the type of websites on which the content might be available. Younger participants aged 16-17 admitted that they would find a way to access PIN-protected content if they felt all their friends were watching it.

"The PIN you can try and stop them going into it. But as they get older how often does that PIN stay secret, let's be honest?" South England, Female, 18-34, Ethnic minority, Non-parent.

"I had to have my PIN to get in and watch stuff. I went to my friends' houses, and I completely disregarded that PIN. I was, like, 'I want to watch what they get to watch.' So, I was watching 15s that I should not have been watching at 13 years old." North England, Male, 16-17 Ethnic minority, Non-parent.

Parents watching content with older children helped to mitigate concerns about content.

Showing older children some edgier content was not always seen as negative, if this happened in a controlled way with parental support and supervision. With older children facing more complex issues in their lives, watching content together as a family was sometimes considered helpful to open discussion about these issues. This supported parents to address questions raised by the content in a safe space. Some parents saw this as a way of helping support their children to prepare for adulthood.

"I have a 17 year-old. We tend to watch things together, like *Love Island*, and I don't have an issue about sex, and it's educational. We can have an open discussion about things, although she's not in that position, but we are open to having that discussion." South England, Female, 35-54, Ethnic minority, Parent (16-17).

Parents also described instances when watching edgier content with their children gave them an opportunity to discuss what they perceived as a potential disconnect for children between reality and the content they were watching. They wanted to ensure their children understood the difference. Parents said it was important to have questions raised and discussed with a responsible adult instead of information coming from online sources or friends of a similar age.

"Now he's asking me about drugs, but if he took that information out of the house and not been able to get a correct answer that would be quite scary to me." Wales, Female, 35-54, White, Parent (7-11, 12-15).

"I try to use programmes as educational tools with my son, showing that things happen in the real world and there's things you can do to help protect yourself, fight back, organise, and get support." South England, Female, 18-34, White, Parent (3-6, 7-11).

# 7 Expectation of regulation on linear TV and VoD services

Linear TV and BVoDs were often assumed to follow similar regulations around harm, offence and protecting children.

Participants had some awareness that rules applied to linear TV, with many participants able to reference the watershed. Regulation was expected to be stricter for linear television services than SVoDs because content is scheduled and viewers – particularly children – could come across something inappropriate by chance more easily. Participants also considered that their expectations of how these services are regulated was reflected in the nature of the content available. As explored in Chapter 3, some participants considered linear TV to host more programming that is less likely to push boundaries.

"Linear TV is more regulated and it's easier to make complaints. These things are tighter on linear TV then on Netflix." Scotland, Male, 35-54, Ethnic minority, Parent (3-6, 7-11).

"With linear TV, you're at the mercy of the schedule so they have a duty to then warn you what they're about to show you." Wales, Male, 55+, White, Non-parent.

Participants thought that all linear channels should be subject to similar rules. However, some were unsure whether this was the case, with discussions about whether regulation for the BBC might be stricter because they considered Channel 4 and Channel 5 to be more liberal in what they broadcast. There was also the belief that "smaller" channels can push boundaries further because they have niche audiences who will have sought them out and with less likelihood that other viewers might stumble across the content unawares.

As BVoDs were mainly perceived as catch-up services, most participants thought they would follow the same regulation as for broadcast TV. This was often because participants assumed the content would have already been broadcast on linear. However, even if content was developed just to be made available on a BVoD service, they still felt it should follow the same rules as broadcast content because it was being made available by the same organisation. That said, there was some discussion about whether more robust audience protections can be used on BVoDs, compared to linear channels, so there would be scope for edgier content. In this way BVoDs were seen as having similarities to both linear TV and SVoDs.

"I think [BVoD] should be the same [as linear]. To me they're the same body. I would expect them to be the same, even something just developed for iPlayer." North England, Female, 55+, White, Parent (Child left home).

"If they were making something specifically for [BVoDs], yes, just put the PIN on it, so that if it is through the day and it's a child that's watching, ITVX, or whatever, the BBC iPlayer, if they've got to put the PIN in then they don't get access to it." South England, Female, 18-34, White, Parent (3-6).

SVoD regulation was assumed to be different because (i) people make active choices to consume content, (ii) generally pay a subscription, and (iii) the services are international.

Participants were less sure about SVoD regulation, with some confusion about how similar this would be to linear TV and BVoDs. They also reflected on their experience of the range of content available on SVoDs, which they considered to be broader, and to include some edgier programmes.

While some said they had always thought regulation was similar across all TV services, others assumed SVoD regulation was less strict than linear TV. In addition to their experiences of the breadth of content available informing this view, there were several reasons participants gave to explain their assumptions about SVoD regulation.

Firstly, participants pointed to viewers being able to make a more informed, active choice when deciding whether to watch a programme. This meant it was less likely that viewers would accidently stumble across content they did not intend to view. As discussed in Chapter 2 participants liked having this element of choice. They felt edgier content could be included in SVoD services as long as viewers are appropriately warned and protections are in place to prevent children being exposed to it. Most participants felt audience protection tools on SVoDs were generally effective and this was seen as justification for offering greater choice to consumers, and indeed for less strict regulation.

"If you want to retain freedom of choice, there have to be different rules. You choose to take the service of Netflix or Amazon Prime, and if you want to watch something that's not controlled by the vanilla standards of normal TV, there needs to be different rules." North England, Male, 35-54, White, Parent (7-11).

Another reason participants assumed SVoD regulation might be different was because these are subscription services. Participants felt that because they tended to pay direct subscriptions to the service, they should be allowed to see more varied content if they wanted to.

"Then you are paying for an extra service, for the freedom to see whatever you want on those channels, whatever they are offering you, so they are less licensed." South England, Male, 18-34, White, Non-parent.

Some also assumed that SVoDs would follow different rules because they are international companies serving users not just in the UK. Participants felt that this would make it difficult to apply consistent regulation to these services. There was an awareness of different shows being available on the same services in different countries, and some described using a Virtual Private Network (VPN) to access content available in other countries. It was felt using VPNs would become more widespread if further rules were introduced limiting the variety of content in a specific country.

"Netflix and Prime - these are being broadcast from outside the UK? So I don't see how you could enforce any rules." North England, Female, 18-34, Ethnic minority, Parent (0-3).

There was also uncertainty about who viewers could complain to if they were exposed to inappropriate content on SVoDs. Some participants thought that they would complain to the service provider, but others felt there should be an independent body, such as Ofcom or another regulator, dealing with issues. However, they were unsure whether this would be within Ofcom's remit.

#### Attitudes towards regulation on linear TV and VoD services.

Participants were introduced to the regulatory landscape as it was at the time of the research, with a focus on the areas of harm, offence and protecting children.<sup>13</sup> They were first introduced to the Broadcasting Code, and the purpose behind each of its different sections: protecting the under-18s; harm and offence; crime, disorder, hatred and abuse; religion; fairness; privacy; due impartiality; due accuracy; and commercial references. It was made clear to participants that these rules only applied to programmes broadcast on linear television, radio, and BBC iPlayer.

After gauging their initial reactions to the Broadcasting Code, they were then introduced to the different regulatory regimes that apply to different kinds of service. This involved moderators explaining the rules for:

- Non-BBC VoD platforms under UK jurisdiction (e.g. ITVX, Disney+). They were told that these services follow a more limited <u>set of rules</u> compared to the Broadcasting Code which are not as stringent and focus on: protecting under-18s; rules about prohibiting material likely to incite hatred and violence; and rules about product placement and sponsorship.
- Other VoD platforms <u>not</u> under UK jurisdiction (e.g. Netflix, Apple TV+). It was explained that the limited statutory rules applying to these platforms depend on where they are based. For example, if a viewer wanted to complain about content they had seen on Netflix or Apple TV+, they would need to contact the relevant foreign regulator. These rules would not necessarily be the same as those imposed by the UK.
- Video sharing platforms (e.g. TikTok, Snapchat, YouTube). VSPs were not a central part of the study, so were not focused on heavily during the discussions. They were introduced as online video services, which allow users to upload and share videos with the public. UK-established VSPs must comply with new rules protecting users from harmful videos which include: incitement; child sexual abuse material; terrorism; racism; anything which could impair a child's development. They were told that Ofcom does not handle complaints about specific pieces of content but does have a duty to ensure that these services are protecting users<sup>14</sup>. However, there are VSPs not under UK jurisdiction, such as YouTube, which might put their own voluntary initiatives in place, but these are not always enforced by a statutory regulator.

This regulatory landscape was summarised to participants, in Figure 8.1, which shows that different rules can apply to the same programme depending on where it is viewed.

<sup>&</sup>lt;sup>13</sup> This research was conducted across January and February 2023, before the Government published the Draft Media Bill in March 2023. The draft bill outlined amendments to VoD regulation, including greater consistency in how linear and VoD services are regulated. The Draft Media Bill (29 March 2023) can be found here: <a href="https://www.gov.uk/government/publications/draft-media-bill">https://www.gov.uk/government/publications/draft-media-bill</a>

<sup>&</sup>lt;sup>14</sup> On 26 October 2023, the Online Safety Act became law. This will eventually subsume the Video Sharing Platform regulatory regime described in this report.

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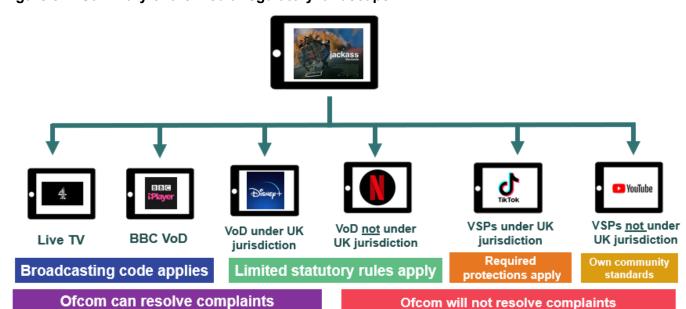


Figure 8.1: Summary of the media regulatory landscape

#### There was an awareness that rules exist on linear TV but limited detailed knowledge.

As in previous research, participants did not know in detail which rules existed for linear TV and there was a very limited recognition of the Broadcasting Code itself. However, there was some awareness of specific rules that relate to nudity or violence and an understanding of the concept of the watershed.

"I think Ofcom have a list of things they cover that they will or won't allow after [the] watershed...I think there's a very stringent set of rules but I don't know what they are." South England, Female, 18-34, Ethnic minority, Non-parent.

Participants were generally supportive of the Broadcasting Code once introduced to it. It was considered to be comprehensive in covering all the relevant areas, and they felt it was important to have rules around what can be broadcast. Rules around protecting children were seen as the most important.

"I think the Code gives comfort, in that you know that this exists, and that there will be nothing that will be extreme." Scotland, Female, 18-34, Ethnic minority, Parent (3-6).

However, a few participants raised doubts about the extent to which the Broadcasting Code was enforced. These participants felt they could give examples of the rules not being followed. They also felt that some rules were too open to interpretation. For example, there were concerns around the watershed, with some thinking soap operas and reality television are pushing boundaries around what is acceptable.

"I've never heard of [the Broadcasting Code], and some things you think about you think, well, that definitely didn't follow that." South England, Female, 18-34, White, Parent (3-6, 7-11).

"I do think they do push the boundaries with soaps. They have people that have murdered and hidden bodies under floorboards." Wales, Female, 35-54, White, Parent (7-11).

# Participants had different reactions to the variation in the way broadcast and on-demand services are regulated.

Once introduced to the varying regulatory landscape for VoD content, there were different reactions to the complexity and the extent to which the rules varied across services. Some participants found it surprising that they did.

"It's mind-boggling to think, who would know that there are all these different services, and these are the rules that apply to them?" Scotland, Female, 55+, Ethnic minority, Parent (Child left home).

These participants were concerned that services are available in the UK but do not follow the rules set out in the Broadcasting Code. They tended to be those who had previously assumed consistent rules across linear, BVoD and SvoD services. There was particular concern and surprise that it was not possible to complain to Ofcom about VoD content available in the UK if companies were based in another country. The rules were considered so complex that participants said they would struggle to understand who to contact to complain.

"I'm just so surprised. I would never have thought of that. I always thought Ofcom for everything." Wales, Male, 55+, White, Non-parent.

"I'm surprised at that. I thought if you were based in the UK, that would be it [complaining to Ofcom]. It seems bizarre." Scotland, Male 18-34, White, Parent (3-6).

However, other participants were not surprised, as they had already assumed regulation would be different between different international SvoD services (and also different to UK-based linear and BvoD services). Participants also discussed how SvoD services are businesses competing for subscribers (and did not have similar discussions about traditional broadcasters and BvoDs). These participants thought it was in their interest for SvoDs to create content which pushes boundaries and distinguishes them from what is available on linear TV.

"I'm not surprised there's so many differences in them because I don't know how you could regulate it all. It's an impossible task." Scotland, Female, 55+, White, Parent (Child left home).

"Their aim is to win as many customers as possible. It's their business. Regulation would only hinder what they can produce." *Northern Ireland, Male, 35-54, White, Parent (3-6).* 

They also reasoned that the self-selecting nature of VoD platforms meant there would be fewer regulations because there is a greater onus on viewers taking responsibility for choosing what to watch. The protections available on these services were thought to reduce the risks of viewers stumbling across content.

"It's not like you've turned over and just happened to see something, you've chosen to watch. I'm not surprised at all." North England, Female, 18-34, Ethnic minority, Parent (0-3).

Participants also had different views about whether more consistency in regulation across platforms was desirable or even possible.

Some participants said that they would prefer consistency in how different services were regulated. They felt this would make them much easier to navigate and be fairer to different types of providers. This was considered unrealistic by others given how complicated they found the current system of regulation to be. These participants recognised the challenges of SVoDs being international companies, and so questioned whether it would even be possible to regulate their content in the UK.

Overall, there was general agreement about having consistency in the complaints procedure, so viewers knew who to complain to if they saw something inappropriate. Ideally, this would include a single regulator who they could contact about audio-visual content regardless of the service it was watched on. They felt this would make service providers more accountable, as opposed to just dealing with complaints themselves. Participants also thought this would make it easier for viewers to complain as it would be clear who they needed to contact. They found the current system confusing and said it would deter them from complaining, particularly if the regulator was based in another country.

"It must have to go through a central body somewhere. There should be the same rules for anything in the UK." North England, Male, 55+, White, Parent (Child left home).

"It's so complicated for any ordinary person. Who would they complain to? Has anybody ever complained to Netflix in [the Netherlands] from the UK? It's so far away. Probably people just switch off, rather than going through the process. There's so much out there, the volume of channels and streaming platforms and there's new ones being added all the time. Who would know where to complain?" South England, Female, 35-54, White, Parent (12-15).

However, others were concerned that consistency in the rules would result in SVoDs having tighter regulations, which could lead to content they enjoyed being removed. These participants liked the greater variety of content offered by these services and feared consistency would limit their freedom of choice. They felt that self-selection and the additional protections available on these services meant current regulation was appropriate. They feared that if restrictions were to become tighter then SVoD content might become less exciting.

"Imagine you've got your favourite show, you've been watching it for seasons, and then all of a sudden, a new set of standards means you can't watch it in the UK. You can watch programmes about midwives on ITV on a Sunday night, but that's it." Scotland, Male, 35-54, White, Parent (12-15)

Overall, there were doubts over whether it was possible for regulation to change, considering how complex the current regulatory landscape would be to untangle and the number of services that it would involve. They felt that by the time this was achieved, technology would have advanced again to present new problems which would need to be addressed.

Given this, participants were understanding of how challenging it would be to make the regulation more consistent. The overwhelming priority for participants was for any regulation to focus on protecting younger children in particular.

# 8 Appendix A: Summary of attitudes towards clips and hypothetical scenarios

Table A: Summary of attitudes towards stimulus clips

# Clip The Handmaid's Tale, Channel 4 VoD service (formerly All4) Rating: G It also included an age

It also included an age check box asking if they were over the age of 16 (full warnings available in the methodology chapter).

The clip is taken from a dystopian drama series in which women able to bear children are treated as property. This shows a scene in which they are punished for insubordination, suggesting a group of women are about to be hanged.

#### Content

Most participants felt that it was "dark and gritty" with an effective use of emotive music to build tension and suggest an impending graphic scene with female characters about to be hanged. However, the hanging does not actually take place, and participants felt this made a difference to acceptability, as the tension was considered more psychological.

Indeed, some wanted to watch the series after viewing the clip. Others described feeling extremely uncomfortable, even though they did not consider the content personally offensive or harmful. There were a few concerns it could be triggering for experiences of self-harm or suicide.

"I thought it was quite sensitively filmed. It was the anxiety and the tension that was well filmed. The fact you didn't see the hanging. That's different from seeing the horror of slasher movies where you actually see blood and violence."

#### Context

Some participants were familiar with the show being available on Channel 4's linear channel and catch-up service, and Amazon Prime Video. This, along with the fact they did not think this clip was excessively violent, informed their opinion that it would be acceptable across platforms. However, they thought it would need to be shown after the watershed on linear TV because it tackles adult themes.

Regardless of the platform, participants thought it would need a warning about distressing scenes, particularly around violence and misogyny. The 16+ rating was seen as appropriate, but if available on a VoD service, some participants felt it could also be PIN protected.

"I think from a mental health point of view, if you have been affected by this, they need to have a few things at the end and warnings at the beginning." North England, Female, 55+, White, Parent (12-15, 16-17).

#### Intent

51

Participants thought the way in which the clip was raising the tension was appropriate as part of a compelling drama. They reasoned that because the clip was taken from a series, the scene would have been contextualised as part of the narrative which may make the content less disturbing as viewers would have come to expect it.

Some thought because the content was based on a well-regarded book, this made it more acceptable, as it was making the literature and its themes more accessible to a wider audience. They felt that the themes of misogyny and the consequences of authoritarian leadership were currently topical, and so the content was also seen as educational.

"It is very dark, but some of it has been reflected in what is happening in real life. Rolling back abortion rights in America, and what's happening in Afghanistan."

The Boys, Amazon Prime Rating: 18 (full warnings available in the methodology chapter).  The clip was taken from a series about superheroes who embrace the darker side of their celebrity and fame. It shows characters attending a superhero "orgy" party with full nudity showing genitalia and scenes of sexual nature.	Scotland, Male, 55+, White, Parent (12-15).  Most participants described the sexual content in this scene as extremely graphic, with some even saying they stopped watching it because for them it bordered on pornographic. While some did not want to watch the clip, they appreciated others might find it funny and they assumed the scene might have been contextualised more within the series. Their main concerns were if children were exposed to it.  "I don't mind a bit of nudity and sexual content but that took my breath away. I didn't even know where to look or what was going on. That's triple X stuff." North England, Male, 35-54, White, Parent (16-17).	There was consensus that this should not be available on linear TV, but participants were more accepting of it being on a VoD platform because it became an individual's personal choice to watch it once they had been appropriately warned. They generally thought the warnings on the clip were appropriate and extensive, although some wanted the 18-rating to be a larger size on the screen to make it unavoidable.  "If you're paying to watch something and elect to watch it and you've read the warnings, we're adults, it's pure fantasy. It is very tongue-in-cheek." North England, Female, 18-34, White, Parent (3-6, 7-11).	South England, Female, 35-54, Ethnic minority, Parent (12-15, 16-17).  Participants believed the scene was probably included to shock viewers, but they assumed there would have been a build-up throughout the series to set viewers' expectations. It was also considered more acceptable because of the comedic tone and the fact it was clearly fantasy, so not "real life". There were some concerns about the superhero branding, as this made it more likely that children might try to access it.  "There was an element of comedy. The raunchy bit and the orgy or whatever. The funny bit about it. I'd be happy for it to be available if they put that it's an adult thing and they're putting the age you need to watch it." South England, Male, 55+, Ethnic minority, Parent (12-15).
Jimmy Carr: His Dark Materials, Netflix. Rating: 18 (full warnings available in the methodology chapter).  The clip was taken from a stand-up comedy special in which a comedian jokes about a variety of subjects, including rape and sexual abuse.	Participants believed that joking about rape pushed boundaries too far and felt this could cause harm to victims of sexual abuse. Some, particularly female participants, described feeling personally offended by the content.  "I find it really quite unacceptable, that kind of humour. There's no place for it." Scotland, Female, 55+, White, Parent (Child left home).	Participants generally agreed that this clip would not be acceptable on linear TV. There were some who felt the content of the clip was too offensive to even be shown on VoD platforms because they believed it is never appropriate to joke about sexual abuse. However, others, even among those offended, thought it could be available on SVoD, as they felt it clearly stated that it was 18 and that set expectations, but it could be coupled with a pin. The	Some participants felt Jimmy Carr was purposefully joking about controversial topics to generate publicity about his show. It was seen by some participants as inappropriate to target victims of sexual abuse who could be triggered by his jokes and the fact other people in the crowd were laughing at them. Even though some argued Jimmy Carr was trying to raise awareness of the topic, comedy was not seen as an appropriate way of doing this.

Others felt that if appropriately warned, then this is the type of "close to the bone" comedy that they would expect from Jimmy Carr and found it funny. However, this was typically caveated with the fact they had a "dark" sense of humour, and they could appreciate not everyone would find it acceptable.

description was also perceived as too vague as it did not explicitly state there would be jokes about rape, and the tag "raunchy and witty" was seen as inappropriate given the content.

53

"I honestly don't think his stand-up should be on linear TV. Some of his stuff is really bad but I would only go and choose to watch it if it was ondemand and PIN protected." North England, Male, 35-54, White, Parent (16-17).

There were concerns that these jokes could be repeated or even "normalise" rape and negatively influence young men, particularly because Jimmy Carr is a well-known comedian who often appears on family friendly shows.

"If you have teenage boys, not everyone will be mature and intelligent enough to realise he's making a joke. It's a very serious subject, and they will just think it's funny, and it normalises it. I don't think it should be on telly. If he wants to highlight it, he could speak about it properly and make people listen." Scotland, Female, 55+, White, Parent (12-15, 16-17).

However, others felt that if viewers were provided with appropriate warnings, then the intent behind this clip was to be funny and that comedy should not be censored.

Little Britain,
BBC iPlayer
Rating: G (full
warnings available in
the methodology
chapter)

This was taken from a comedy sketch show. This excerpt shows an assistant using offensive terms to describe an Asian student over the phone to her manager.

Participants viewed this content as explicitly racist and outdated and felt that society had moved on. A few participants said they found it funny but seemed embarrassed to say this and could recognise why it would be offensive.

"I understand that people might find it funny, but I just think there's not a place for it anymore, especially with the laughter [track]. I think there's a bullying element as well as what they This content was not considered acceptable for linear TV and many were surprised that it was available on BBC iPlayer. Others thought a VoD platform was appropriate because it meant viewers could have the choice about whether to watch the content or not.

However, they did not think the current rating was enough, wanting a warning about the racist language and an explanation for why it was still accessible. For some the content was The clip was considered less acceptable because the participants felt it was purposely offensive in stereotyping and targeting an ethnic minority group for comedy purposes. Some reasoned that it was important to still show this content to reflect the beliefs of society at the time. However, there were concerns that it could normalise racist behaviours which could be repeated by young children.

They are described as having "yellowish skin, slight smell of soy sauce ... the ching-chong china man".

were laughing at." Wales, Female, 35-54, White, Parent (7-11, 12-15).

considered too problematic, even for VoD.

"I think lots of the themes are quite outdated. If you want to watch it, then go ahead and watch it. But it's not something we need to promote on linear TV. It's not that hard to be offended by it. It's not in the interests of society to watch those themes anymore." Wales, Female, 18-34, White, Parent (0-3).

"If I saw my daughter watching that and then mimicking it, I'd be horrified. If kids are watching it, they need it to be explained that that's not acceptable. It's passed off as acceptable behaviour towards fellow human beings that come from a different part of the world." Scotland, Male, 35-54, White, Parent (12-15).

The Aristocats,
Disney+
Rating: 0 with a
written explanation
about why the clip
was still included in
the film (full warnings
available in the
methodology chapter)

An animated film about a kidnapped family of aristocratic cats and the alley cat who helps them. It shows the cats singing and dancing to a feline jazz band and stereotypes East Asian culture.

It was not immediately obvious to everyone what could be perceived as offensive in this clip, particularly among older participants. Many of those who did identify the negative stereotyping did not find it overly problematic as they reasoned it was only brief and it was created during the 1970s when attitudes were different. Some felt they could remove this section of the song but were not themselves overly offended. They felt nostalgic towards the film generally and struggled to separate this from their opinion of the specific content. However, they were wary that children might mimic the stereotypina.

"For me, you'll blink, and you'll miss it. I get it but it was not even 10 seconds and then it was gone. If a child says, what is that? Then you can have a healthy debate, but it doesn't need to be cancelled just because there was a brief reference

Most participants thought that this clip could be shown on linear TV and available on children's profiles on VoD services. They questioned whether a "0" age rating made logical sense because someone that young was unlikely to watch it anyway. The written explanation about why the content was still available split opinion. Some thought it was unnecessary and thought it would encourage people to look for offence. Others thought it provided an educational opportunity with their children and appreciated Disney taking responsibility. Some felt they could just remove this part of the film.

The content was seen as of its time, and participants found it more acceptable because they did not think it was created with the intent of causing offence. There were concerns that it could result in children mimicking the racist behaviours, or subconsciously shape their attitudes towards other cultures. However, they reasoned that they watched this as a child, and it did not negatively impact their attitudes today.

"If you are a 3-year-old and you turn it on, you're not going to understand the repercussions if you sing a song that you've seen in a Disney film."

Wales, Female, 35-54, White, Parent (7-11, 12-15).

Happy Xmas (War is Over),
Linear TV (music video showed in Christmas programming).

A music video, set to "Happy Xmas (War is Over)" by John Lennon shows distressing video footage of war and other tragedies. to an Asian culture." South England, Male, 35-54, White, Non-parent.

Most participants were familiar with this kind of content, having seen similar visuals during charity appeals and news stories. They did not find the content offensive but described it as extremely upsetting and uncomfortable viewing. However, they thought it was important to be shown this type of content because its "real life" and raises awareness of what is happening elsewhere in the world.

"The horrific and uncomfortable imagery with the music video, I think it still has the shock factor. There is still value, and it was supposed to shock people, a bit political and a bit of a statement." Wales, Female, 18-34, White. Parent (0-3).

Generally, it was thought that this type of content would still be acceptable for linear TV, although because it is older content they thought it would be more likely to be on YouTube. Some tended to think it did not need a warning as that limited the video's shock factor, but others felt it was upsetting enough to require one. It was recognised as having an educational value in showing the consequences of war. However, they were unsure whether it would be appropriate during Christmas music scheduling.

55

It was seen as acceptable content for VoD, but they did not associate it with the type of content offered by these services.

"That's a music video. You expect to see war imagery on the news but if you sit down and have TV on in the background with the tea, and then that comes on, I think some people would find that upsetting." Scotland, Male, 35-54, White, Non-parent.

Participants typically thought the video was acceptable, as they assumed it had been put together to raise awareness of what was happening in war-torn countries, and they thought this was still relevant today. They thought the content needed to be uncomfortable to watch because that was the point. There were some concerns that it could negatively impact people who have served in the armed forces or migrants from countries where this happens.

"If it was put together for the purpose of raising awareness, then it should make you feel a way and it's important to make people feel uncomfortable. It serves its purpose if it's making me feel uneasy." Northern Ireland, Male, 18-34, White, Parent (0-3).

Erax Netflix Rating: PG

In this clip from a children's short film, an aunt buys a book for her young niece, and they accidentally release the scary looking Erax creatures when the aunt reads a part of the story; this clip shows the moment where they first encounter these creatures.

The horror in this clip was deemed too frightening for younger audiences, especially the way in which the special effects and music built suspense. The scene where the monster bit the aunt's leg was highlighted as particularly inappropriate for young children, with fears that it could cause them to have nightmares. However, it was considered more acceptable for older children who could handle the tension, because there was no extreme violence, blood or gore. In fact, some parents thought their teenage children might find it funny.

"I think it's appropriate for older children. There's no blood and guts in it." North England, Male, 55+, White, Parent (Child left home).

This content was perceived as acceptable across services, but participants expected to find on SVoDs such as Netflix or Disney+. They thought it was less likely to be on linear TV, because they thought the content was too frightening.

56

"I thought Disney or Netflix, but for an older age group. It just had the whole Disney thing, the whole book coming to life, the special effects." South England, Male, 35-54, White, Parent (12-15).

The content was rated as PG with warnings of "violence, threat, parental guidance suggested". Some participants wanted more specific guidance on age. 10+ was a common suggestion as some felt it was too scary even with guidance. The description of "family friendly" was also seen as misleading as some felt this meant they could leave their child watching it alone, despite the PG rating.

Participants thought the explicit intention behind this clip was to frighten audiences and in part, this explained why it warranted stricter warnings. However, this genre was considered more appropriate for older children, because it did not push boundaries too far in terms of violence but felt more adult than other material targeted at children. They likened it to shows they were familiar with like *Goosebumps*.

"It's a bit silly, a bit fun. A nice lighthearted horror for a child that's old enough." South England, Female, 35-54, White, Parent (7-11, 16-17).

The Punisher Disney+ Rating: 18+.

This clip was taken from an action series about a marine seeking to avenge the murders of his family. It is from the season finale and shows a violent fight between The violence in this clip was considered very extreme in showing excessive blood and gore, with some participants even deciding to stop watching it in the research. Participants expressed concerned about children watching this clip, as they may find it upsetting. They also were concerned specifically about young boys watching, and having this behaviour normalised for them.

There were some strong concerns about this clip being available on Disney+ as participants perceived this as a more "child friendly" service. Similarly, they felt the Marvel branding would encourage children to select the programme, or that parents might let children watch it without reading all the warnings because of a false sense of security. However, they were open to this content being available elsewhere, with some saying it

Participants thought the intent behind this clip would be to entertain those who like this type of violent content. They recognised it was taken from the season finale, where violent scene might be expected by the audience, who would have their expectations raised throughout the season.

However, they struggled to reconcile this with it being available on Disney+.

two of the main characters, where one has his face scraped along broken glass. "Wasn't it overly violent? How do they expect people to keep going with that violence? He should've been dead with the first bit of glass, it's just vile. It's the most vile thing I've seen recently, I thought it was over the top." Wales, Male, 55+, White, Parent (Child left home).

could be on a movie channel on linear TV, either post-watershed or with a PIN.

**57** 

"You associate Disney with kids' things. If I had an older child, I'd give them the remote and be like, 'Put on what you want.' You would think it was aimed at children. I have an issue with that." South England, Male, 18-34, White, Parent (0-3).

Participants believed that it needed a clearer description than "thriller, superhero, crime, action adventure" as again they thought this downplayed the severity of the violence. They thought it needed to reference the dangerous weapons, extreme gore, and adult themes. That said, they appreciated that it was rated an 18+, but including a PIN would also be important.

"The only thing is a parental pin, but that warning is nowhere near informative enough. I would like to see, contains scenes of a graphic nature." North England, Female, 18-34, Ethnic minority, Parent (0-3). "There are times when he does know the PIN codes. I am surprised that's on Disney+. My nephew would be terrified of that fighting scene." South England, Female, 55+, Ethnic minority, Non-parent.

Hillbilly Nation, Channel 4's YouTube. Warning: "Adult humour and content"

Hillbilly Nation was available on Channel 4's YouTube account but was not broadcast on their linear channel Most participants thought the stunts in the clip, including targeting fireworks at each other, self-administering tattoos, and dangerous driving, would be harmful if viewed by children as they might try and mimic these behaviours. It was felt these activities were being glamourised by the light-hearted way in which they were shown. There were also concerns about the partial nudity displayed, and

Participants typically expected to see this type of content on YouTube. However, they expected broadcasters like Channel 4 would only include content online which they would also have on their linear channels or BVoD platforms. They were seen to have a responsibility to uphold standards across their brand.

As this clip featured social media influencers, it was seen to be targeting young people, as they were more likely to know who they are to seek out this content. Participants felt it was encouraging them to mimic the stunts, which they felt would cause them physical harm.

or BVoD platform. It features two viral TikTok stars - King Billy and The Mountain - who are self-proclaimed 'hillbillies' from Devon and shows them attempting several stunts.

some described being repulsed when one of the stuntmen was shown vomiting.

"Young boys watching it might want to recreate some of the stunts. That poses an issue." South England, 18-34, Female, Ethnic minority, Parent (0-3). "I've got boys who are 12 and they're obsessed with these crazy humans that do crazy things so I associate it with YouTube." North England, Female, 35-54, Ethnic minority, Parent (12-15).

58

Concern about the possible harm was heightened by the lack of accompanying warnings. This content was considered to be easily accessible by children, and so participants felt it warranted an advisory warning or an age-rating, with some even suggesting it should be 18+.

"A silly programme. I should imagine the target audience is young people. There has to be a language and a 'don't do this at home' warning."

North England, Female, 55+, White, Parent (Child left home).

"I'd be worried about my children seeing that. There are dangerous things they could copy from that programme. It was crazy." Wales, Female, 35-54, White, Parent (7-11, 12-15). Ipsos | Ofcom Audience Expectations 59

Table B: Hypothetical scenarios used to explore expectations of harm and offence.

Scenario	Content	Context	Intent
A comedy programme where someone uses the word c*nt.	Participants recognised this language pushed the boundaries of acceptability, and that people could be offended. Some strongly felt that it should never be used but others were more comfortable with it, explaining they had become desensitised to any offence it held. The primary concern was children overhearing it.	On linear TV, this language was associated with post-watershed comedies on channels such as Channel 4 and ITV2, where it was deemed more acceptable because it met expectations for these services. However, participants still felt it was used more commonly on SVoD shows and could readily reference examples. They felt a warning mentioning that the show contained very strong language would be appropriate.	It was seen as more acceptable within a comedy. This was because it could be used in a humorous context, where the chances of it being offensive were reduced. They referenced watching comedies and stand-up comedians who used the word, and if used sparingly, they thought it added a comedic shock value. However, there was a recognition that some may find it misogynistic, especially if used in a different context (e.g., if directed at someone in a drama).
A documentary showing someone injecting heroin into their arm.	Participants would feel uncomfortable, but for those who enjoy watching documentaries, they thought it was important to reflect reality. However, the context of where and how it was being injected was important in determining acceptability. Others said they would avoid watching this under any circumstances.	This was seen as acceptable across different services. Participants referenced Louis Theroux and Channel 4 documentaries, as well as Netflix, as examples where similar content had been shown. They expected a warning at the start referencing that there would be scenes of drug-taking, as well as an age rating. They did not acknowledge that age ratings are not widely used on linear TV. It was also seen as important to offer sources of support for viewers that might have personal experiences of the topic.	This scenario was more acceptable because it was in a documentary, and so while uncomfortable viewing, could have an educational value if presented sensitively. However, it would be more concerning if it was being depicted in a comedy or drama, especially if aimed at younger audiences, as it could glamourise drug-taking, and potentially cause harm.
A drama with a graphic sex scene	There was familiarity with scenes such as this, and they thought it was	Participants thought this would be more likely to appear on an SVoD service.	From their experience, participants thought these scenes were typically

showing full frontal nudity.	happening more often on TV. However, they thought full-frontal nudity was probably too gratuitous and unnecessary. They would be concerned about children being exposed to this.	They felt it was unlikely to appear on linear, although they went on to reference shows such as <i>Naked Attraction</i> and <i>Game of Thrones</i> . If on linear then they would want it to be after the watershed.	unnecessary and did not add much to the show. Although they did name examples, such as <i>Bridgerton</i> , where they felt it made the show more exciting. However, this content had to be clearly age rated if on a VoD platform.
A historical drama about slavery where someone uses the "N" word.	Participants recognised this was an extremely offensive term, and they thought its use would have to be well justified. They were sensitive towards the fact that people may be negatively affected and cautious of normalising it. That said, this was a circumstance where some, including ethnic minority participants, thought it would be appropriate to reflect the reality of the time.	They expected to see this type of drama across different services and could cite examples from linear and VoD services. However, they thought it would warrant a warning in case someone might be upset or offended by it being used unexpectedly. Some thought a higher age rating would also be necessary, although others believed it was important children learned about racism and the conditions of slavery under parental guidance.	The context of a historical drama was seen as crucial for determining acceptability. It would have been considered less acceptable in a music video, for example, but the historical perspective helped justify it as educational. If they did not use it, then some participants feared they would be misrepresenting history and what people were subjected to. Although some still found it unnecessary and thought you could reflect the history in other ways.
A film depicting a violent fight which results in someone being murdered with a hammer blow to the head.	Participants recognised this as extreme violence, but felt it was commonplace on TV now, and thought it would be acceptable for it to broadcast. Some would be uncomfortable with the blood and gore, but explained they would just choose not to watch it.	This was perceived as acceptable across platforms and thought it would even be permissible in a soap opera. They expected audiences to anticipate these types of scenes depending on what they had chosen to watch, but still thought a warning of "violence" would be appropriate.	Participants felt these scenes are included for their entertainment and shock value. They thought similar content could sometimes be excessively violent, which was contributing towards people becoming desensitised. This led to some concerns about normalising this behaviour among younger people.

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## 9 Appendix B: Research materials

#### Workshop 1 – Discussion guide

Timings	Discussion	
5 mins	Introduction and set up	
	PLENARY	
	Introduction with plenary slides (1-3)	
	<ul> <li>Lead moderator to introduce self, moderators, notetakers, and any observers.</li> <li>Explain the role of Ipsos - we are an independent research agency, aiming to help you share your views, ensuring we hear from everyone. Ipsos is working with Ofcom, the communications regulator, on a research study which aims to understand views on different types of things you might watch or listen to on different channels and services.</li> </ul>	
	Explain confidentiality and MRS Guidelines:	
	<ul> <li>Explain that the groups will be video recorded, this will be securely held and deleted at the end of the research.</li> <li>Explain that we will start the recording after we have done introductions (both audio and video). Explain that personal information, e.g. name, email etc. will not be shared with Ofcom. The video recording will be securely deleted after the research project has ended.</li> </ul>	
	Written report - may use quotes but no detailed attribution.	
	Explain different ways to watch programmes (slide 4):	
	<ul> <li>We will be talking about what might or might not be appropriate across the various different ways of watching TV programmes. This might be watching scheduled linear TV on channels like BBC One or Channel 4, using broadcaster's video on demand services, like iPlayer or ITV Hub or the new ITV X, or using subscription video on demand services like Netflix and Amazon Prime Video.</li> </ul>	

We may be talking about topics/themes in programmes which some people may find sensitive or inappropriate. Please respect each other's opinions and if you need to take a break or leave then that is fine. **BREAKOUT GROUPS** Housekeeping/ground rules: All opinions are valid / no right or wrong answers Disagreements are fine but respect each other's opinions Please try not to talk over each other Please can everyone turn their mobile phones on silent or off. The group will last 3 hours and there will be a break in the middle. There will be a lot to cover so we may need to move people on. This is not personal, but only to ensure we fit everything in. 15 mins Introduction and reflection on pre-task Mini-group moderator: Any questions before we begin? Participant introductions: Moderator to introduce themselves and then go through the group doing introductions. Moderator to ask each participant for their name, where they are from, and to ask them what the last programme they enjoyed was (to get the group starting to think about TV consumption, and a sense of what types of content they like) Reflections on the pre-task How did you feel about keeping the diary? Was there anything surprising? What have you been watching? How do you typically watch content? PROBE: Scheduled vs VoD services

	Do you watch different types of programmes on different services?	
	PROBE: What type of things do you watch on scheduled linear TV? Recorded linear? BVoD? SVoD?	
	PROBE ON VoD: How do you access these services? TV vs. Laptop vs. Phone?	
	Did you see or hear anything that you thought was inappropriate? Or made you feel uncomfortable?	
	What was it about?	
	What about it made you feel that way?	
	Who were you watching this with?	
	Who do you think it might have had an impact on?	
35 mins	Audience viewing expectations	
	BREAKOUT GROUPS	
	How do you typically decide what you are going to watch?	
	On scheduled linear TV? On BVoD? On SVoD?	
	What are your viewing habits – e.g., regular vs. binge watching?	
	How has this changed over the past year? Five years? Ten years?	
	Thinking about the variety of programmes and content available on different services, what type of content do you expect to watch on?	
1		

- What type of content would you expect to watch on scheduled linear TV? Between different channels?
- What type of content would you expect to watch on BVoD? Compared to linear or SVoD?
- What type of content would you expect to watch on SVoD? Compared to linear?
- How does this vary, if at all, between SVoDs? Netflix? Disney+? Amazon Prime Video? Others?

#### Are there things you don't like to see in programmes, or that make you feel uncomfortable?

#### MODERATOR: TAKE NOTE OF THE TYPE OF CONTENT TO REPEAT BACK

- PROBE: Sexual content? Violent content? Swearing? Discriminatory language? Inaccurate depictions?
- Why is that? What don't you like about it?
- Have you ever seen something that you have then complained about? What? Who to?
- Even if you are comfortable watching content, what type of things might other people find uncomfortable to watch? Who? Why?
- You might not want to watch this content, but are you comfortable with it being available for others to view?

#### Have your own personal views about this type of content changed over time, or not?

- Any examples? PROBE: Sexual content? Violent content? Swearing? Discriminatory language? Inaccurate depictions?
- How about society's views? Has anything become more or less acceptable compared to 5 years ago? 10 years ago?
- How does this vary by channel or service?

#### Where do you think that you are more likely to find programmes with this type of content?

MODERATOR: USE NOTES TO REPEAT BACK

- On scheduled linear TV? On BVoD? On SVoD?
- What VoD service? Channel?
- Why do you think they make these programmes?
- Who do you think they are appealing to?

#### How could someone avoid watching this type of content?

- PROBE FOR DETAILS: On scheduled linear TV? On BVoD? On SVoD?
- How does this differ between services? Any content it's easier / more difficult to avoid?
- Does it change when you are watching with others? Who?
- What about when watching with children?

## IF NOT COVERED: Are there any specific things you expect to be in place to help people avoid things they don't want to see?

PROBE: Watershed, scheduling around the content is broadcast (e.g., weekends, holidays, school time), start and finishing time of shows, channel it is being shown on, expectations for the programme, self-selecting nature of content on VoD, content warnings, pins, age checking.

#### SLIDE 5 AFTER SPONTANEOUS UNPROMPTED DISCUSSION

- On scheduled linear TV?
- On BVoD? On SVoD?
- How might these be used? Do you use them?
- IF NO: Why not? Do you know how to use them?

	How effective do you think these protections are? Is there anything else you'd like to see?		
20 mins	Deep dive: Protecting children from seeing inappropriate content		
	BREAKOUT GROUPS		
	We now want to move onto think specifically about protecting children from seeing inappropriate content.		
	What type of content do you think is inappropriate for children to see?		
	PROBE: Sexual content; drugs, smoking, and alcohol; violence and dangerous behaviours; offensive language; nudity.		
	FOR EACH TYPE: What are the associated risks? Why do they need protecting?		
	How does this vary by age? What about younger teenagers vs. older teenagers?		
	How do your expectations around age-appropriate content vary by service / channel, if at all?		
	PROBE: On scheduled broadcast TV?		
	On BVoD? On SVoD?		
	Are any services/channels riskier? Who for? Younger teenagers vs. older teenagers?		
	What are your experiences, if any, of children or teenagers coming across this type of content?		
	Who was it? What happened? How old were they?		
	What type of content were they exposed to?		
	How did they find this? On scheduled broadcast TV? On a BVoD or SVoD? Are any services riskier?		

- What measures/tools, if any, have been put in place to stop this?
- IF NEEDED: How might you feel if a child was exposed to this content? How could this happen?

#### How well protected do you think children are from being exposed to inappropriate content?

- What type of protections are in place?
- PROBE / SLIDE 5 IF NEEDED: Watershed, scheduling around the content is broadcast (e.g., weekends, holidays, school time), start and finishing time of shows, channel it is being shown on, content warnings, PINs, children's profiles, age checking.

67

- On scheduled linear TV?
- On BVoD? On SVoD?
- What concerns do you have?
- How does this vary by age?

#### Whose responsibility do you think it is to protect children from being exposed to inappropriate content?

- PROBE: Parents? Service provider? Channel? Regulator? Who is <u>most</u> responsible?
- How does this vary between services? PROBE: Linear vs. BVoD vs. SVoD

#### How do protections on VoD services compare to other spaces on the internet?

- For example, a platform like YouTube? Or compared to Snapchat? TikTok? Others?
- Do VoD services feel more or less safe? Why?
- How does this vary between VoD services? PROBE: BVoD vs. SVoD

10 mins	BREAK
45 mins	Deep dive: Harm and offence
	Break out groups
	How would you define offensive content?
	What type of things would it depict?
	What could the implications of someone seeing offensive content be?
	And how would you define harmful content?
	What type of things would it depict?
	What could the implications of someone seeing harmful content be?
	MODERATOR TO CAPTURE A DEFINITION FOR EACH TERM
	IF NEEDED:
	Offensive: Offensive content might include things which people find insulting or inappropriate – either to themselves or others. This could include swearing, rude jokes, stereotypes or derogatory statements.
	Harmful: Harmful content might include things which could lead to some one being: (1) Physically harmed – such as promoting dangerous behaviour or self-harm, giving unsafe health or medical advice (2) Financially harmed – such as through mis-selling or mispromoting products (3) Emotionally or mentally harmed – such as through viewing disturbing or upsetting content.
	What is offensive and what is harmful are not mutually exclusive. Some types of offensive content, like strongly discriminatory material, can be so strong that they constitute hate speech and are potentially harmful (e.g., to community cohesion)

#### ROTATE ORDER DISCUSS HARM AND OFFENCE WITH OTHER MODERATORS BETWEEN WORKSHOPS

69

#### **Discussing offence**

#### What type of content would you personally find offensive?

- Does this differ by service? PROBE: On scheduled linear TV? On BVoD? On SVoD?
- Where would you expect to find offensive content?
- How would you feel about this content being shown?

#### What about other groups? What would they find offensive?

- Parents
- Children
- Older people
- Particular religious background
- Particular ethnic groups
- People with different sexualities/gender identities from your own
- People with disabilities

#### **Discussing harm**

#### What type of content would you personally find harmful?

- PROBE: Different kinds of harm: Financial harm? Physical harm? Emotional harm? Societal harm (e.g. to community cohesion)?
- Does this differ by service? On scheduled linear TV? On BVoD? On SVoD?
- Where would you expect to find harmful content?
- How would you feel about this content being shown?

#### What about other groups? What would they find harmful?

- Parents
- Children
- Older people
- Particular religious background
- Particular ethnic groups
- People with different sexualities/gender identities from your own
- People with disabilities

#### High level scenarios

I'm going to share my screen where I have a few hypothetical scenarios of the type of content that might be in a programme. I want to spend a few minutes thinking about each.

70

MODERATOR: Share screen and show scenarios in a random order:

**SLIDES 6-10.** 

- A drama with a graphic sex scene showing full frontal nudity
- A documentary where someone is depicted injecting heroin into their arm
- A film depicting a violent fight which results in someone being murdered with a hammer blow to the head
- A comedy programme where someone uses the word c\*nt
- A historical drama about slavery where someone uses the "N" word

#### FOR EACH:

- How would you feel about this being shown? What are the risks of this being shown?
- What channel / service would you expect to see this on? Why / why not? (PROBE SPECIFIC SVOD).

	What warnings or protections might you want around this type of content?		
	Who might find this harmful or offensive / upsetting / distressing?		
35 mins	Introducing the rules		
	Breakout group		
	Spontaneous expectations for rules		
	What type of rules, if any, do you think might be in place for the type of content that can be shown on scheduled linear TV?		
	How might these vary between channels / genre / when or how you're watching the programme?		
	And would you expect the rules to be the same or different for BVoDs?		
	How might the rules vary? Stricter or laxer compared to linear? Why?		
	Would you expect the rules to be the same across different BVoD services?		
	What about if the content was created just for BVoD and not shown on scheduled linear?		
	And would you expect the rules to be the same or different for SVoDs?		
	How might the rules vary? Stricter or laxer to linear? To BVoD? Why?		
	Would you expect the rules to be the same across different SVoD services? PROBE: Netflix vs. Disney+ vs. Amazon prime vs. Apple TV etc.		

#### Who, if anyone, might you complain to if you saw content that you thought was inappropriate?

- On scheduled linear TV? On BVoD? On SvoD?
- What about if you saw something inappropriate elsewhere on the internet YouTube? TikTok?

#### **Introducing the Broadcasting Code**

MODERATOR: SHARE SCREEN AND EXPLAIN THE BROADCASTING CODE.

#### **SLIDES 11-15.**

MODERATOR TO INTRODUCE THE BROADCASTING CODE, WITH A BRIEF OVERVIEW OF WHAT IT COVERS AND WHY BUT MAKE CLEAR OUR FOCUS IS ON THE PROTECTING UNDER-18s AND HARM AND OFFENCE. EXPLAIN IN GREATER DETAIL THE RULES IN PLACE FOR THESE SECTIONS. EXPLAIN THAT IT COVERS TV, RADIO AND BBC iPLAYER / LINEAR PROGRAMMES PUT ON BVODS FOR CATCH-UP PURPOSES <u>BUT NOT</u> CONTENT MADE SPECIFICALLY FOR BVODS (OTHER THAN iPLAYER).

**72** 

#### What do you think about the Broadcasting Code?

- Had you heard of the Broadcasting Code before? What did you know?
- Is it stricter / laxer than you would expect?
- Did you think anything was missing?

#### How important do you think it is for there to be rules about these things?

- Was anything particularly important? Less important?
- Who are they to protect? Might they be more important to other people? To people from certain groups?
- How does the importance of rules vary by genre? PROBE: Films vs. programmes vs. music videos vs. sports vs. news etc.

Thinking about freedom of speech, how do you think rules should balance against being able to enjoy programmes? And programme makers having the creative freedom to make content?

- Does this change between scheduled linear TV vs. Video on Demand? PROBE: Between different VoD services?
- Who might think differently? PROBE: Parents vs. non-parents?

#### Introducing VoD rules

**MODERATOR:** 

#### **SLIDES 16-17**

SHARE SCREEN AND EXPLAIN THE VARYING REGULATORY LANDSCAPE ACROSS DIFFERENT PLATFORMS.

MODERATOR TO INTRODUCE HOW ONLY LIMITED STATUTORY RULES APPLY TO MOST VOD SERVICES AND LIMITED TO NO PROTECTIONS ON VIDEO SHARING PLATFORMS.

#### What do you think about the current rules?

- How do you feel about there being different rules across different types of services?
- Is this surprising to you? Why / why not?
- Have you noticed different types of content are available across different services? PROBE: Examples?

#### Does it matter to you that the rules are different across different services?

Why / why not? Who might it matter to?

#### What impact do you think the rules being different across different services has?

	On the type of content available on scheduled linear TV? On BVoDs? On SVoDs?
	On what audiences expect from the content they see?
	Do you think there is a reason the rules are different across different services?  • Do you think there are any challenges with regulating VoD? BVoD vs. SVoD?
10 mins	Final reflections
	Thinking about society overall, what is it most important to have rules about when it comes to the type of content available?
	PROBE: Offensive content? Harmful content?
	Who needs to be protected?
	How does this compare to what is important to you personally?
	How does the importance differ across platforms and services? Why?
	What about VoD services? PROBE: BVoD vs. SVoD
	MODERATOR THANK PARTICIPANTS AND GO BACK TO PLENARY.
5 mins	Wrap-up
	Workshop chair provides a summary of the workshop and hears from each group on most important priorities and any key issues discussed.
	Moderator to sum-up most important issues from each break-out

Thank participants and explain next steps – including next online task and incentives.

# Workshop 2 - Discussion guide

Timings	Discussion		
5 mins	Introduction and set up		
	PLENARY Introduction		
	<ul> <li>Lead moderator to welcome back and reintroduce self, moderators, notetakers, and any observers.</li> <li>Explain the role of Ipsos - we are an independent research agency, aiming to help you share your views, ensuring we hear from everyone. Ipsos is working with Ofcom, the communications regulator, on a research study which aims to understand views on different types of things you might watch or listen to on different platforms.</li> </ul>		
	<ul> <li>Explain confidentiality and MRS Guidelines:</li> <li>Explain that the groups will be video recorded, this will be securely held and deleted at the end of the research.</li> <li>Explain that we will start the recording after we have done introductions (both audio and video). Explain that personal information, e.g. name, email etc. will not be shared with Ofcom. The video recording will be securely deleted after the research project has ended.</li> <li>Written report - may use quotes but no detailed attribution.</li> </ul>		
	<ul> <li>Recap (slide 4):</li> <li>We will be talking about might/might not be appropriate across the various different ways of watching TV programmes. This might be watching scheduled linear TV on channels like BBC One or Channel 4, using broadcaster's video on demand services, like iPlayer or ITV Hub or the new ITV X, or using subscription video on demand services like Netflix and Amazon Prime Video.</li> </ul>		

75

• We may be talking about topics/themes in programmes which some people may find sensitive or inappropriate. Please respect each other's opinions and if you need to take a break or leave then that is fine.

#### Warn about sensitivities of clip:

- During the session, we will be discussing the clips you should have watched before on the online platform before this
  workshop. Some of these clips are sensitive and discussions have the potential to be upsetting or triggering. At the end of the
  workshop, we will be sharing some resources and helplines which can offer support for the topics we're talking about today
  and we can forward these onto you directly if you would like them. Please do let us know whether you'd rather not discuss
  certain clips and you can leave that part of the conversation. We want to discuss them because:
  - Hearing your views will help us understand more about people's expectations
  - This understanding will help Ofcom to make future decisions based on people's views about different types of content and people's expectations of different services.

#### **BREAKOUT GROUPS**

# Housekeeping/ground rules:

- All opinions are valid / no right or wrong answers
- Disagreements are fine but respect each other's opinions
- Please feel free to take breaks or step away from the discussion if you need
- Please try not to talk over each other
- Please can everyone turn their mobile phones on silent or off.
- The group will last 3 hours and there will be a break in the middle.
- There will be a lot to cover so we may need to move people on. This is not personal, but only to ensure we fit everything in.

# Reiterate that we will be discussing sensitive and potentially upsetting material:

- Ensure that participants know they can leave at any time and re-enter the discussion with no consequences or cease participation completely without giving a reason
- We may be talking about topics/themes in programmes which some people may find sensitive or inappropriate. Please respect each other's opinions and if you need to take a break or leave then that is fine.

15 mins	Introduction and reflection on pre-task					
	Any questions before we begin?					
	<u>Participant introductions:</u> Moderator to re-introduce themselves and then go through the group ask them to reintroduce themselves and share what their key-takeaway from the first workshop was.					
	Have you noticed anything new, different, or surprising about the content you've watched since our last workshop?					
	What have you been	en watching? On what platf	orms / services?			
	Have you noticed a	any differences between wh	nat you watch on scheduled line	ar TV or BVoD or SVoD?		
85 mins	Reviewing specific clips					
	MODERATOR: Thank everyone for completing the pre-task and watching the clips. Share stimulus to remind people what they watched.  SLIDE 18.  CLIPS INCLUDE – MODERATOR TO NOT SHARE THE SERVICE. PLEASE DISCUSS CLIPS IN ORDER OF YOUR COHORT.					
	MODERATOR TO TAKE A BREAK 10 MINUTE BREAK AT 19:20-30 AIMING TO HAVE DISCUSSED 6 CLIPS.					
	RETURN FROM BREAK FOR REMAINING 3 CLIPS. CONVERSATIONS ON THE FINAL THREE CLIPS CAN BE BRIEFER IF OVERUNNING BUT TRY TO COVER.					
	Cohort 2	Cohort 3	Cohort 4	Cohort 5		
	The Punisher	Little Britain	The Handmaid's Tale	Jimmy Carr		
	The Aristocats	The Boys	Merry Xmas War is Over	The Punisher		
	Jimmy Carr	Erax	Hillbilly Nation	The Aristocats		
	The Handmaid's Tale	Jimmy Carr	The Boys	Merry Xmas War is Over		
	Hillbilly Nation	The Aristocats	Erax	Hillbilly Nation		

**77** 

Merry Xmas War is Over	The Punisher	Little Britain	The Handmaid's Tale
Erax	Hillbilly Nation	The Aristocats	The Boys
The Boys	The Handmaid's Tale	The Punisher	Little Britain
Little Britain	Merry Xmas War is Over	Jimmy Carr	Erax

# Before we begin discussing each of the clips in more detail, generally, how did you find the task?

- Had you watched any of them before?
- Was anything surprising or unexpected?
- Did anything stand out to you? Why?

EACH CLIP TO BE DISCUSSED IN TURN. ROUGHLY 10 MINUTES PER CLIP. MODERATOR TO COVER IN ABOVE ORDER UNLESS RESPONDENTS STEER CONVERSATION DIFFERENTLY:

For each clip:

# What type of service / channel would you expect to see this programme on?

- How would you feel if it was broadcast on scheduled linear TV? Does the channel or time of day matter?
- How would you feel if this was on a BVoD service? How does this compare to recorded linear?
- How would you feel if this was on an SVoD service? PROBE: Does it matter which one? Why is some content acceptable on one service but not another? What makes it different?

# How comfortable are you with this type of content being available?

- How acceptable do you think it is? What score did you give it? Why?
- To what extent does this content have the potential to harm or offend someone? How does this balance against people's and content producers' rights to freedom of expression?

- You might not want to watch this content, but are you comfortable with it being available for others to view on these services?
- How might other people respond? Who might find this more upsetting? PROBE: Children, teenagers etc.? Parents? Religious background? Gender? Race? Someone with a disability etc.

# Would you expect any rules to be in place around this content? What type of information would you expect to be given before viewing this content?

- PROBE / SLIDE 5 IF NEEDED: Mandatory pins (e.g., pins on certain channels which you can't remove and need to put this in before watching content), voluntary pins (such as those that parents/carers can choose to turn on to stop children accessing adult content), age ratings, age checking, content warnings / IF BROADCAST: Pre-watershed?
- Would you expect these to be the same across services? On scheduled linear TV? On BVoD? On SVoD?
- Are there services where you'd expect more rules / information around this content? Are there any where you'd expect less?
- Who should be deciding whether there are any rules / information provided around this content? Who would you trust? The programme maker? The channel / service provider? A regulator? Why?
- How might the audience feel if restrictions were put in place around the content? Does this matter? What might audience's see
  as the pros and cons of restrictions being in place?

MODERATOR: USE STIMULUS SLIDES 19-27 TO SHOW WARNINGS AVALIABLE BEFORE CLIP. NOTE THAT THE MERRY X MAS CLIP DOES NOT HAVE ANY.

#### **SLIDES 19-27.**

# Here are the warnings that the service provider shows before this programme. How appropriate or necessary do you these warnings are?

- What do you think about the level of detail provided in the warning? Do you think anything is missing? What would you like to see more / less of?
- How effective do you think these warnings are?
- Are you surprised this programme is on this service? Why / why not?

# How likely do you think it is that someone might accidentally come across this content?

- How would you feel if you accidentally stumbled across it? (e.g., changing channels, an automatically playing trailer)
- How might other adults feel if they accidentally stumbled across it? Who might find this offensive or harmful?
- How would you feel if a child accidentally saw this clip? How might this affect them? How might they need to be protected?

80

# Would this type of programme have been acceptable five years ago? Ten years ago?

Why? / Why not? What has changed?

## PROBES FOR SPECIFIC CLIPS

- FOR EACH: capture overall views if not already covered
- FOR EACH: probe for this content being available on different services

#### Merry Xmas War is Over, linear TV

MODERATOR NOTE: This was a music video and not used as a charity appeal / to raise money

- How does the context of this being played during the Christmas holidays impact how you feel about it now?
- What about the fact it is a music video? Does that change how you feel about?
- This video was made in 2003. How would you feel about it being broadcast now?

# The Handmaid's Tale, Channel 4 / All4

How did you feel about this scene? Were you surprised it was shown on a linear TV channel?

• Linear TV shows like this one often have a verbal warning before the episode starts, would you be concerned about stumbling across this content without hearing a warning?

## Little Britain, BBC iPlayer

- Were you surprised by this scene?
- Some of the content of this programme has been removed from the episode (such as the comedians David Walliams and Matt Lucas performing as black and Asian characters). What do you think about content from older programmes being removed?
- How would you feel if this programme was shown on linear?

#### The Aristocats, Disney+

- What do you think about older films and programmes that might contain some outdated and potentially offensive content being made available on VOD services?
- Do you think content like this should ever be cut or removed from programmes on VOD services or on television broadcasts?
- Does it make a difference if the content is targeted at children?

# **Erax**, Netflix

- This show is rated PG and available on the children's section of Netflix. How comfortable would you be with a child watching this? PROBE: If they were unsupervised?
- At what age would you be comfortable with a child watching this unsupervised? PROBE: 11/12 vs. 13/14?
- This show was rated by the British Board of Film Classification but VoD services do not have to use these and can apply their own ratings. How would you feel about VoD services doing this? Are there any VoD services you'd trust more or less? Why?
- Although BBFC and similar age rating systems are used on most SVoD services, BVoDs typically do not have specific age ratings and may use "G" for guidance rating which means parental guidance would be needed. However, given the wide

variety and number of programmes on BVoD platforms this could be seen as a proportionate and cost-effective approach to age-ratings. What do you think about the approach of BVoDs being different to SVoDs?

## Jimmy Carr – His Dark Material, Netflix

- Even if some people find this content offensive, is that a problem if the nature of the content is made clear to viewers before they watch?
- Would you feel different about this content being shown on linear?
- Do you think more offensive comedy can be shown on VOD compared to linear?

# Punisher, Disney+

- What do you think about this content being on Disney+ which is service and brand that contains lots of content aimed at children?
- What steps, if any. do you think there needs to be to ensure children using Disney+ are not able to access this content?
- The scene takes place towards the end of the final episode of the series so viewers would have typically watched many hours of the programme up to this point. If the programme was shown on linear, viewers might stumble upon it whilst changing channels. Does that make a difference?

## The Boys, Amazon Prime Video

- How did you feel about this scene? Were you surprised by it?
- How concerned would you be if children to were to watch this given it's portrayed as a superhero show? What steps do you
  think should be taken to make sure they don't?
- How would you if feel if this was shown on broadcast linear TV?

# Hillbilly Nation, YouTube / Channel 4

This show was commissioned by Channel 4, but was shown on their YouTube channel, not broadcast on television. What difference does this make to your views of this content, if any? As it's on Channel 4's YouTube service, would you expect it to follow similar rules to Channel 4's content on its linear channels? On All4? What did you think of the stunts they performed during the clip? Are any additional measures needed to warn people about these, or not? What harm could this cause, and to who (e.g. children and young people)? 10 mins **BREAK - TAKE AT 19:20-30 WHEN GOING THROUGH CLIPS** 40 mins **Reviewing specific scenarios BREAKOUT GROUPS** MODERATOR: Explain we will now be exploring your expectations in depth. This section can also be used to explore hypothetical examples where it might be too harmful of inappropriate to show participants clips. Participants review a series of scenarios **SLIDES 28-32** IF PRESSED FOR TIME THEN CONVERSATION ON SCENARIOS 4/5 CAN BE SHORTENED. MODERATOR ASK GENERIC QUESTIONS FOR ALL BEFORE SPECIFIC PROBES. ROUGHLY 8 MINUTES PER CLIP: 1. In a live current affairs discussion programme on television, a contributor makes an offensive comment about migrants. The host immediately apologises for any offence caused. After the programme is broadcast it is made available on the channel's catch-up VOD service, with the offensive comment still included. Do you think the acceptability of this content is different when it is viewed live or when it is viewed on-demand? Would you expect the offensive content to be included or edited when the programme is made available to view on-demand?

83

- If it was included, would you expect some warnings or content information to alert viewers to the offensive content before viewing?
- 2. On a broadcaster video on demand service, you can watch a scheduled linear channel showing crime dramas that is only available to watch online. At 10am, this showed a scene of an autopsy of a female murder victim with close ups of her wounds and body.
- What rules do you think should apply to scheduled linear channels that are not shown on television (i.e. scheduled linear channels which are only available online)?
- Would you feel differently if you accessed this content before or after the watershed? Would you feel differently if it was PIN protected?
- What kind of information might you expect before watching this programme?
- Currently content shown through a scheduled linear channel only as part of a VoD service (i.e. not also broadcast on a standalone linear TV service) is not regulated meaning there are no rules about what can be shown, when it can be shown, and you cannot complain to the regulator. How do you feel about that? Does this change how you feel about the scenario?
- 3. When browsing the catalogue on a subscription VOD service, a trailer for a horror programme starts to play that includes potentially frightening and bloody images of zombies attacking a group of humans.
- How concerned are you about being shown content on VOD services like this that you have not actively selected?
- Have you ever been shown anything in this way that made you uncomfortable?
- What considerations do you think that providers of streaming services should make when making decisions about what to include in these kinds of trailers?
- 4. A family adventure film that was rated PG (parental guidance) at the cinema has a 9+ rating on Disney+.
- How familiar are you with content being rated PG? How about the +9 rating?
- Do you have a good idea about what this means about the suitability of the content for children? Do you trust a PG rating more than 9+? Do you recognise that a PG rating is granted by the BBFC (British Board of Film Classification) Does this matter?
- How helpful is this kind of specific age guidance for younger children?
- Other films on the service are rated 6+. What differences might you expect in content that is rated 6+ or 9+?
- 5. You start listening to a radio service. During the daytime it plays a song that includes multiple uses of the word f\*ck.
- Would you expect to hear offensive language played on a radio service in the daytime?
- Do you have different expectations for radio content you might listen to through a smart speaker than a traditional radio (in the car for example)?

- What about different kinds of radio services? (i.e. radio stations available on standard radios versus online only radio stations)

#### EACH SCENARIO TO BE DISCUSSED IN TURN. FOR EACH:

# What do you think about this scenario?

- How comfortable would you be with this scenario? Are you concerned that it could happen?
- What are the risks of something like this being shown?
- Who might find this harmful or offensive?

## How does the service it is on inform your opinion?

- How would you feel if it was broadcast on scheduled linear TV? Does the channel or time of day matter?
- How would you feel if this was on a BVoD service? How does this compare to recorded linear?
- How would you feel if this was on a SVoD service? PROBE: Does it matter which one? Why?

#### What warnings or protections might you want around this type of content?

PROBE: Watershed, scheduling around the content is broadcast (e.g., weekends, holidays, school time), start and finishing time of shows, channel it is being shown on, expectations for the programme, self-selecting nature of content on VoD, content warnings, pins, age verification

- How might they help? Do you use them?
- How effective do you think these protections are?
- How would they work across different services?

Priorities and expectations
IF NEEDED RESHARE THE RULES FROM WORKSHOP 1 AND BRIEFLY RECAP REGULATORY LANDSCAPE.
I want you to reflect on everything we have discussed and viewed. Given this, how do you feel about there being different rules for content depending on the context of where it is being shown?
In what circumstances, if at any, does it matter?
Do you think there should be a difference in the rules?
What if someone wanted to complain about something they saw on scheduled linear TV vs. VoD? Is it important that you can complain to an independent body? Should you be able to complain to the service provider first?
How do you think the rules should change in the future, if at all?
Because of changing attitudes? Because of new technology? For other reasons?
What would your priority areas be?
PROBE: The Broadcasting Code? Rules for VoD? BVoD vs. SVoD?
Should regulation be the same or different across different services? Why / why not?
Do your priorities change across services? PROBE: The Broadcasting Code? Rules for VoD? BVoD vs. SVoD? BVoD Vs.
Who should be making these decisions?
Are there specific types of people you think a regulator should focus on protecting?
PROBE: Who? Why?
How does this vary across services?

	What challenges do you think a regulator might face in implementing new rules?
	What about challenges in implementing rules around harm / offence?
	Where do you expect regulation to be in a year's time? 5 years' time?
	What makes you say that? How would that make you feel?
5 mins	Wrap-up
	Workshop chair provides a summary of the workshop and hears from each group on most important priorities and any key issues discussed.
	Moderator to sum-up most important issues from each break-out
	Moderator to <b>SHARE SLIDE 33</b> with resources and helplines about the topics we have discussed and explain we have share this directly with participants if they would like it
	Thank participants – and give details on incentives.

87

# Online community pre-task activities

#### Workshop 1 – Media diary

Welcome to your first activity! Before the first workshop, we'd like you to start thinking about the type of programmes you have been watching recently.

Please answer the questions below either by typing your answers into the text box or you can record a short video of yourself speaking and post it below. Your post will not be visible to other participants but will be viewed by the research team at Ipsos and shared with Ofcom.

The questions have been designed to show you the type of topics we'll be discussing in the workshop and to help us get a better understanding of your habits from the outset. We'd love to hear about:

- What programmes have you been watching over the past couple of weeks?
- How have you accessed these programmes? (e.g., on which channel or service?)
- What made you decide to watch these programmes? How did you pick them?

All details can be important here, so please share all of your experiences.

[OPEN TEXT BOX]
[VIDEO POSTING OPTION]

#### Workshop 2 - Video Clips task

#### 1) Consent

Programme Name, Age rating Release date: [X]

Agreed Ofcom summary statement for relevant clip:

Merry Xmas War Is Over: A music video, set to "Merry Xmas (War is Over)" by John Lennon shows moving images of war and other tragedies. It appeared during uninterrupted festive Christmas programming and was shown between music videos of other well-known Christmas songs such as Walking in the Air and All I Want For Christmas Is You.

**The Handmaid's Tale:** This clip is taken from a dystopian drama series in which women able to bear children are treated as property. This shows a scene in which they are punished for insubordination.

**Little Britain:** A clip taken from a comedy sketch show. This excerpt shows an assistant describing an Asian student over the phone to her manager.

**The Aristocats:** This is a clip from an animated film about a kidnapped family of aristocratic cats and the alley cat who helps them. This segment shows the cats singing and dancing to "Everybody Wants to be a Cat" with a feline jazz band.

**Erax:** In this children's short film, a woman buys a book for her niece, and they accidentally release the Erax creatures; this clip shows the moment where they first encounter these creatures.

**Jimmy Carr, His Dark Material:** This clip is taken from a stand-up comedy special in which a comedian jokes about a variety of subjects, including rape and sexual abuse.

**The Punisher:** A clip taken from an action series about a marine seeking to avenge the murders of his family. This is from the season finale and shows a fight between two of the main characters.

**The Boys:** A clip taken from a series about superheroes who embrace the darker side of their celebrity and fame. In this clip two of the characters are shown attending an adult superhero party.

**Hillbilly Nation:** HillBilly Nation features two viral TikTok stars - King Billy and The Mountain - who are self-proclaimed 'hillbillies' from Devon and shows them attempting a number of stunts.

Are you happy to watch this clip to help inform discussion during the workshop?

- 1. Yes
- 2. No [GO TO NEXT CLIP]

## 2) [Clip Name] - Video Clip

Please press play to watch this video clip. Please watch this clip in a quiet environment, where no one else is able to see the content. If you do not want to continue watching at any point you can stop and skip to the next question. Once you have finished watching this clip, please answer the two short questions before watching the next.

## 3) [Clip Name] - Acceptability

Thank you for watching this clip from [INSERT NAME].

On a scale of 1 to 10, where 1 is totally unacceptable and 10 is totally acceptable, how would you rate the content of the clip?

# 1 – Totally unacceptable 2 3 4 5 6 7

10 - Totally acceptable

8

#### 4) [Clip Name] - Your response

And why have you just given this clip the acceptability rating you did? What did you think about the clip overall?

[GO TO NEXT CLIP]

# 5) Thank you

Thank you for watching all of these video clips. We look forward to seeing you in the online workshop.

# Stimulus materials - Workshop 1

# Different ways to watch programmes?

#### Scheduled linear TV



When you are watching any programme as it is broadcast and you have to watch it when scheduled by the channel, e.g. BBC, ITV, Channel 4

#### Broadcaster Video on Demand services (BVoD)









These are video on demand services offered by traditional broadcasters. The services contain content which can be watched at a time of your choosing.

And you may also be able to access live stream TV through BVoD platforms

#### Subscription Video on Demand (SVoD)













These are streaming services which you pay to access, and then you can watch shows offered by them when you choose.

Some do not have subscriptions but instead advertisinge.g. Freevee/ Pluto TV



# The Broadcasting Code

What we'll focus on

under-18s

To make sure children are protected from programmes that are unsuitable for them.

audience are protected appropriately from content in programmes that could be harmful / offensive to them.

Crime, disorder, hatred + abuse

Harm and offence

To make sure that programmes that could encourage or incite crime or lead to disorder are not broadcast.

Religion

To allow people to express their faith freely in programmes, but to ensure that vulnerable viewers are protected from exploitation, and religious programmes do not abuse other religions.

**Fairness** 

To ensure that a person / organisation who is featured in a programme is portrayed fairly.

**Privacy** 

To ensure that a person or organisation's privacy is not unwarrantedly infringed.

Due impartiality + due accuracy

To make sure viewers and listeners can trust what they see and hear in the news, and that news / programmes on politically controversial subjects are duly impartial.

Commercial references To ensure programmes and adverts are kept distinct so viewers are protected from the risk of financial harm and know when they are being sold to.



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# Protecting under18s...

What are the rules for?

To make sure children are protected from programmes that are unsuitable for them.

What content is unsuitable for children?

Programmes that include offensive language, violence, sex, nudity, drugs or dangerous behaviour that could be imitated must be aired at times when children are less likely to see them for example, after 9pm (the watershed) on TV.



## Harmful content...

What are the rules for?

To make sure that adults in the audience are protected appropriately from content in programmes that could be harmful to them.

What is harmful content?

Programmes that, for example, promote dangerous behaviour, hate speech, or could result in financial harm (e.g. unfair competitions or votes you pay to enter), harm to health (e.g. suggestions to abandon treatment for serious illness), or encourage self-harm or suicide.

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# Offensive content...

What are the rules for?

To make sure that adults in the audience are appropriately protected from offensive content in programmes.

What is offensive content?

Programmes which include offensive language, violence, sex, humiliation, distress, violation of human dignity, discriminatory treatment or language. This can be aired but it must be justified by the context (how the programme is presented to the audience).

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It is also important to consider freedom of expression...

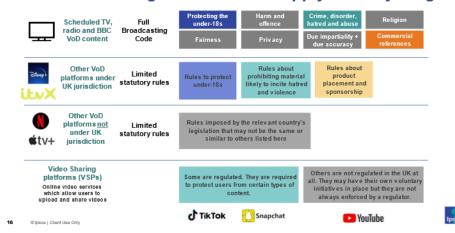
Freedom of expression is everyone's right to hold opinions without interference and to seek, receive and share information and ideas.

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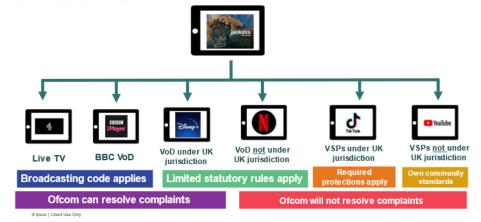


Ipsos | Ofcom Audience Expectations

# The Broadcasting Code does not apply to everything...



# Different rules apply to the programme depending on where viewed...



# Stimulus materials - Workshop 2

Before watching His Dark Material on Netflix...



lorer

# Before watching The Punisher on Disney+...





Ipsos | Ofcom Audience Expectations



# Before watching the Aristocats on Disney+ ...

This programme includes negative depictions and/or mistreatment of people or cultures. These stereotypes were wrong then and are wrong now. Rather than remove this content, we want to acknowledge its harmful impact, learn from it and spark conversation to create a more inclusive future together.

Disney is committed to creating stories with inspirational and aspirational themes that refl the rich diversity of the human experience around the globe.

To learn more about how stories have impacted society visit: www.Disney.com/StoriesMatter

OUR VIDEO WILL START IN 10





# Before watching Hillbilly Nation on Channel 4's YouTube channel...







## Before watching the Handmaid's Tale on All4 ...



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# Before watching The Boys on Amazon Prime... (PART 1)



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# Before watching The Boys on Amazon Prime...

(PART 2)



SOME SCENES MAY NOT BE SUITABLE FOR SOME, REALLY MOST, LET'S BE HONEST ALL VIEWERS. BUT REST ASSURED THAT ANY CONSENSUAL RELATIONSHIPS DEPICTED, BE THEY HUMAN, ANIMAL, SUPERHERO, OR OTHER, AREN'T REAL, HARMED NO ONE, AND IN FACT COST A HILARIOUSLY LARGE AMOUNT IN VISUAL EFFECTS.

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# Before watching Little Britain on BBC iPlayer ...



26 © Ipsos | Client Use Only



# Before watching Erax on Netflix...



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# **Our standards and accreditations**

Ipsos' standards and accreditations provide our clients with the peace of mind that they can always depend on us to deliver reliable, sustainable findings. Our focus on quality and continuous improvement means we have embedded a "right first time" approach throughout our organisation.





#### **ISO 20252**

This is the international market research specific standard that supersedes BS 7911/MRQSA and incorporates IQCS (Interviewer Quality Control Scheme). It covers the five stages of a Market Research project. Ipsos was the first company in the world to gain this accreditation.



# Market Research Society (MRS) Company Partnership

By being an MRS Company Partner, Ipsos endorses and supports the core MRS brand values of professionalism, research excellence and business effectiveness, and commits to comply with the MRS Code of Conduct throughout the organisation. We were the first company to sign up to the requirements and self-regulation of the MRS Code. More than 350 companies have followed our lead.





#### **ISO 9001**

This is the international general company standard with a focus on continual improvement through quality management systems. In 1994, we became one of the early adopters of the ISO 9001 business standard.





#### **ISO 27001**

This is the international standard for information security, designed to ensure the selection of adequate and proportionate security controls. Ipsos was the first research company in the UK to be awarded this in August 2008.



# The UK General Data Protection Regulation (GDPR) and the UK Data Protection Act (DPA) 2018

lpsos is required to comply with the UK GDPR and the UK DPA. It covers the processing of personal data and the protection of privacy.



## **HMG Cyber Essentials**

This is a government-backed scheme and a key deliverable of the UK's National Cyber Security Programme. Ipsos was assessment-validated for Cyber Essentials certification in 2016. Cyber Essentials defines a set of controls which, when properly implemented, provide organisations with basic protection from the most prevalent forms of threat coming from the internet.



# **Fair Data**

Ipsos is signed up as a "Fair Data" company, agreeing to adhere to 10 core principles. The principles support and complement other standards such as ISOs, and the requirements of Data Protection legislation.

# For more information

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# **About Ipsos Public Affairs**

Ipsos Public Affairs works closely with national governments, local public services and the not-for-profit sector. Its c.200 research staff focus on public service and policy issues. Each has expertise in a particular part of the public sector, ensuring we have a detailed understanding of specific sectors and policy challenges. Combined with our methods and communications expertise, this helps ensure that our research makes a difference for decision makers and communities.

