



Machine-readable and interoperable
age classification labels in Europe

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Implementation Strategy Report
British Board of Film Classification (BBFC)

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Policy background

About the BBFC

The British Board of Film Classification (BBFC) is an independent, not-for-profit company based in London which classifies films, video on all physical formats (DVD and Blu-ray disc, for example) and certain video games, advertisements and trailers released in the United Kingdom. It also classifies, on a best practice voluntary basis, video content for distribution online and commercial and internet content delivered by the UK mobile networks. The BBFC operates transparent, well-understood and trusted co-regulatory and self-regulatory classification regimes, based on years of expertise and published Guidelines which reflect public opinion and the risk of harm; and is accountable to UK Parliament.

Legal and political background

Cinema

The British Board of Film Censors was set up in 1912 by the film industry as an independent body to bring a degree of uniformity to the classification of film nationally. Local Authorities remain legally responsible for what is shown in cinemas under the Licensing Act 2003 and can still disregard any of the BBFC's decisions, passing films we reject, banning films we have passed, and even waiving cuts, instituting new ones, or altering categories for films exhibited under their own licensing jurisdiction. This does not happen very often. Local Authorities add an important element of local democracy into the classification process.

Video

In 1984 Parliament passed the Video Recordings Act (VRA). This act states that, subject to certain exemptions, video recordings offered for sale or hire commercially in the UK must be classified by an authority designated by the Secretary of State. The President and Vice Presidents of the BBFC were so designated, and charged with applying the new test of 'suitability for viewing in the home'. At this point the Board's title was changed to the British Board of Film Classification to reflect the fact that classification plays a far larger part in the BBFC's work than censorship.

The VRA makes it illegal to supply any video within the UK which has not been or refused an age rating by the BBFC. There are some limited exceptions to this (for example, educational works or works predominantly concerned with sport, religion and music which do not contain any material unsuitable for younger children). It is also an offence under the Act to supply video works to individuals who are (or appear to be) under the age of the classification designated.

Online

Streaming and downloading of films is not yet regulated by law and age ratings issued by the BBFC for theatrical releases **cannot** be used for content distributed on digital video platforms. The BBFC, in collaboration with major video distributors and platforms has developed a voluntary scheme for platforms offering downloads and streaming video to use BBFC age ratings under a digital licence. Since 2013 we have also regulated, on a voluntary basis, commercial and internet content delivered by the UK's mobile networks.

How we work

In order to protect children from unsuitable and even harmful content in films and videos and to give consumers information they might need about a particular film or video before deciding whether or not to view it, the BBFC examines and age rates films and videos before they are released. This independent scrutiny prior to release ensures the highest possible level of protection and empowerment.

Films and videos are watched all the way through by specialist trained staff and are each awarded an age rating and content advice, the latter known as BBFC insight. Ratings are reached by applying the standards and criteria contained in our published Classification Guidelines.

Typically, a team of two views a film for theatrical release. In most cases a Senior Examiner will confirm the team's recommendation. But if the team is in any doubt or fails to agree, or if important policy issues are involved, the work may be seen by other members of the Board up to, and including, the Director and Presidential team. Occasionally we need to take specialist advice about the legal acceptability of film content or its potential for harm.

The same process exists for DVDs and Blu-rays though generally these are seen by a team of one. However, opinions from other colleagues may be required for more difficult works.

We look at issues such as discrimination, drugs, horror, dangerous and easily imitable behaviour, language, nudity, sex, and violence when making decisions. The theme of the work is also an important consideration. We also consider context, the tone and likely impact of a work on the potential audience.

The release format of a work has an impact on classification. Our decisions on the age rating of DVDs and Blu-rays can occasionally be stricter than at the cinema because there is a higher risk of underage viewing in the home and a greater potential for watching scenes out of context.

BBFC Guidelines

It is important that the BBFC's classification standards are in line with what the public expects and that its decisions take account of what the public finds acceptable at each age category. Therefore every 4-5 years, the BBFC carries out a major public consultation exercise to find out what the public thinks about the age rating of films and videos before they are released and whether the BBFC's classification standards meet public concerns.

The BBFC adjusts its standards and criteria in response to any changes in public attitudes.

These standards are laid out in the BBFC's Classification Guidelines. The Guidelines detail what is acceptable at each age category, from U to R18. They also set out the laws and principles which impact on the BBFC's work.

There are two key principles, laid out in the Guidelines, under which we operate:

- to protect children and vulnerable adults from potentially harmful or otherwise unsuitable content
- to empower consumers, particularly parents and those with responsibility for children, to make informed viewing decisions.

Dissemination of our ratings

Notifications of BBFC decisions are delivered in plain text to the content owner via our online portal and once finalised, are then published to our searchable public website. Several RSS feeds are available for users to track our latest decisions and film ratings are published on our twitter account. Our mobile app, available for iPhone and Android also carries the latest and most relevant ratings and is designed to support users at the point of consumption, i.e. at the cinema or retail store. Additionally, films aimed at younger viewers are also published to our separate children’s website.

Use of BBFC ratings offline

The BBFC works closely with the film and video industry to ensure rating information is displayed prominently alongside the content itself. Ratings and BBFC insight are featured on film posters and in cinemas. Film distributors are also required to display a “black card” that contains the rating information for at least 5 seconds prior to the start of a feature exhibited in a cinema.

Video works released on packaged media (i.e. DVD and Blu-ray) are also subject to the Video Recordings (Labelling) Regulations 2012 to ensure the rating is displayed prominently on the product packaging.

Use of BBFC ratings online

Online retailers of packaged media products are entitled to use the BBFC’s age ratings (text or symbols) for these works for free with reference to our General Free Licence. However, for content distributed on digital video platforms only digitally compliant age ratings can be used and the platform itself must be licensed.

Age ratings issued by the BBFC for theatrical releases may not be used for content distributed digitally but all videos issued with an age rating under the VRA are also automatically issued with an online age rating. In addition, the BBFC operates a low-cost online only rating service for works exclusive to digital platforms or for online distribution prior to a packaged media release.

The annual licence fee for digital video platforms is tiered and based upon the estimated number of titles provided over the course of the year. To date, over 20 platforms supplying content for streaming or download are licensed to display BBFC ratings.

Coverage

The BBFC has been rating theatrical films since 1912 has classified around 74,000 unique titles - the vast majority of films released in UK cinemas over this period.

Since 1984 we have classified about 204,000 videos a packaged media release. These all have a digital rating for use online.

We have rated a further 2000 works via our online-only service. Taking into account the above and our growing number of partnerships with digital video platforms, increasingly parents can expect to see an accurate, accredited BBFC age rating on products they rent or buy online; particularly when those products are feature films.

Relevance of electronic labels

For the most part, our age ratings are delivered to the content owners in plain text via our online portal and they will pass on the relevant information to third parties, i.e. cinema exhibitors, DVD manufactures etc., as they see fit. Some of these third parties will also make use of BBFC resources including our website, data feeds and API to keep up-to-date. However, as there are legal bases for regulating cinema admissions and the supply of video recordings, the use of BBFC ratings became widespread in the physical world without requiring electronic labels.

To an extent, this has followed through to the online world. Most cinema websites and online retailers list our ratings as a matter of course. But as BBFC ratings are well established for cinema admissions and packaged media, there has been little appetite for any adoption of electronic labels to disseminate this information. Many third parties appear to be content with the manual ingest of data into their own systems.

Our research shows that familiarity with BBFC ratings has led many parents to also expect to see age ratings on films purchased online. However, in our experience the ratings data on many digital video platforms is inaccurate. To address this, we provide rating matching and compliance services to our licensed partners. By working closely with digital platforms, increasingly a film purchased for streaming or download is likely to have a digital compliant rating available at or before the point of purchase. Many of our partner platforms support our ratings in a parental control system.

YouRateIt

YouRateIt is an international tool for rating online video content developed in the UK, Netherlands and Italy and created for platforms which host significant amounts of video content. The tool is a simple questionnaire, designed to be completed by those uploading videos onto a site, or by the crowd, or both. It generates an immediate age rating which varies from country to country according to different national standards and societal concerns. It may be customised to meet the requirements of individual platforms. The low cost tool was created at the request of the Brussels-based CEO Coalition for making the internet a safer place for children. It is being pilot tested by Mediaset in Italy over the next few months.

Finances

The BBFC is a not for profit organisation, and its fees are adjusted only to cover its costs. In order to preserve its independence, the BBFC never receives subsidies from either the film industry or the government. Its income is solely from the fees it charges for its services. The BBFC consults the Department of Culture, Media and Sport before making any changes to its fees.

Technology background

Overview of BBFC age ratings

The BBFC system has changed over the years. Due to the age of data that we carry, old ratings must still be supported as some titles have never been resubmitted for a modern classification.

Ratings table

Symbol	Text	Description	Numerical age for MIRACLE
	U	Universal – Suitable for all	4
	PG	Parental guidance - General viewing, but some scenes may be unsuitable for young children	8
	12	Suitable for 12 years and over	12
	12A	Suitable for 12 years and over	12
	15	Suitable only for 15 years and over	15
	18	Suitable only for adults	18
	R18	To be shown only in specially licensed cinemas, or supplied only in licensed sex shops, and to adults only	18
Legacy ratings			
	Uc	Universal – Suitable for all	4
A	A	Advisory - Those aged 5 and older admitted, but not recommended for children under 14 years of age	5
AA	AA	Suitable for those aged 14 and older	14
H	H	Suitable for those aged 16 and older	16
X	X	Suitable for those aged 18 and older	18

BBFC insight

Unlike some other age rating systems, we do not supply fixed descriptors. Instead, we supply a short textual description of the issues found in a film, video or DVD work called BBFC insight. This text can be up to 75 characters in length. For MIRACLE, we will map this to the cd-opentext field.

Data storage

The BBFC database stretches back over 100 years of age ratings, many of which were originally recorded in handwritten ledgers and, later, in documents and paper files before computerised databases became prevalent. Some of these records are still being digitised.

Over the years, the nature of the data we record has changed in many ways. Fields have been added to newer records, some data points we see as no longer necessary to record and records have been adapted to fit changes in the BBFC system. The flexibility required to store the data we have collected over such a long period of time is not a strength of relational databases requiring a strict schema. As a result, we have always preferred document/multi-value orientated solutions. Originally PICK and later IBM Notes. In more recent years, we have experimented with modern equivalents such as MongoDB on some smaller scale projects.

Access to data

Presently, the majority of our classifications are provided to content owners in plain text. Content owners will manually enter age rating details from our online portal or e-mail notifications into their own systems and pass them on to their partners in the manner they see fit. Often this will be a subset of the information we provide, in many cases just the rating itself which simply becomes an item of metadata on their own systems. This is usually replicated at the point of contact with the consumer, be that the cinema chain or retailers own database. On some digital video services that offer products for download, the rating might be attached as metadata within the file itself but this is always done at a later point in the supply chain.

We also provide data on demand to selected third parties. This will involve either the generation of ad-hoc or regular reports, delivered in a spreadsheet format or in some cases direct data access via our REST-like API.

As part of our offering to digital platforms, we provide rating matching and compliance services, sometimes on a large scale for tens of thousands of titles at a time. These requests are usually fulfilled via internal tools and delivered as data dumps for bulk ingest into the platforms own systems. Some ad-hoc requests are processed via a front end to our API on our developer portal.

Licensing

Access to data is currently limited based on the business needs of the organisation. Data provided to digital video platforms is underpinned by a commercial licence, charged for annually based on the number of titles carried by the service. The licence also includes some restrictions on how the ratings data can be used to ensure it is presented accurately. Other third parties may be able to use our data as part of a strategic partnership or under our general free licence but these instances are limited and reviewed on a case-by-case basis. There is no public access to our API at present.

BBFC API

The BBFC API has been developed internally using some of the principles of REST to provide a read-only interface to our entire database of age ratings. Data can currently be provided in JSON or JSONP and is authenticated by an API key. The API underpins our public website, mobile apps and is actively used by several third parties.

Ratings and Decisions

Many film and video titles in the BBFC database will have been rated several times, be that for cinema release, home entertainment, different versions including extended cuts and so forth. Additionally, over the years some titles have had cuts waived or been re-rated for modern certificates or to be brought in line with our latest guidelines.

In the BBFC API, these objects are represented as decisions and it is likely there will be several decisions relating to a given film or video work. For some applications this level of detail isn't required so the API can also return a higher level rating object which is essentially an aggregate of all known BBFC decisions for a given title. A rating object is what you will typically see when searching on the BBFC website. Typically a title will only have one rating object which will represent the current BBFC rating of the title.

Applications that need to display a BBFC rating for a specific version of a title, however, must use the data from the correct decision. Depending on their use case, applications should expect to retrieve a top level rating object but drill down to one or more of the decision objects for specific details.

Endpoints

The BBFC API is designed to facilitate the following actions;-

- Finding an age rating for a particular film or video work
- Iterating through feeds of recent or updated BBFC ratings or decisions
- Obtaining more detailed information about a specific rating or decision

To this end, the following public endpoints are offered;-

Match

The Match API will attempt to isolate the exact rating for a given title, director and year. When accurate values for all three of these fields are provided, the match will be highly reliable and will often return an unambiguous single result. However, applications should always be tolerant to the possibility of multiple matches and consider the confidence of any given match.

The BBFC database dates back to 1912 and covers the vast majority of film and video works released in the UK during this time. A title alone will nearly always be too ambiguous. The string “Top Gun” for example will return four different results.

Search

The search API operates on a wider scope than the match API and will instead, return the widest array of results possible for a given query akin to a free-text search of the BBFC database. Rating objects are prioritised over decision objects in that the latter are only returned if no ratings can be found.

Suggest

Similar to the search API, the suggest API will return up to five suggestions for the given query and is largely to facilitate using BBFC data in an auto-complete bar. Only rating objects and a subset of the normal fields will be returned.

Ratings

Will return a feed of new or updated *ratings*

Decisions

Will return a feed of new or updated *decisions*

Details

The details endpoint will return the full details for any rating or decision in exchange for a BBFC identifier.

Implementation Strategy

Our approach to implementing MIRACLE will be to extend our existing API to support the retrieval of age ratings in the MIRACLE format. This tallies well both with our current approach and recent experience providing age ratings to third parties.

Whilst a BBFC rating can certainly also be authored as a distributed electronic label to be supplied with a piece of media content, we have found this produces poor results in practice. Ratings are often missing, incorrect or applied to the wrong content and this is, in part, due to the length and complexity of the supply chain for commercially produced film and video content. Indeed, it is more common for third parties at the end of the supply chain to seek accurate age rating data from the BBFC as it has not reliably made its way down the chain from the content owner.

Considerations & requirements

We need to offer data in the MIRACLE format alongside our existing API and alternative methods so as to not undermine the collaborations we've undertaken with our partners to date. The set of age ratings provided, however should be the same (licence restrictions permitting) so that partners can compare the two offerings and assess whether the MIRACLE format meets their needs.

Where our data is currently provided to digital video platforms under commercial agreements, these need be respected. Equally however, we want to encourage experimentation with the MIRACLE format to support the project.

Our approach needs to consider the potential publication of YouRateIt data during the lifecycle of the project.

Risks and challenges

The level of demand for data in the MIRACLE format is currently unknown. There is a risk that high demand adversely affects our ability to provide data services. We have invested in more hardware to ensure that we can try and scale up to any unexpected demand but techniques such as rate-limiting or more aggressive caching may need to be implemented, or failing that, further investments in hardware, over the course of the project.

The MIRACLE format only defines the data structure of the age-rating label, not how this label might be acquired in the context of a centralised service and how related metadata related to discovery might be included. For example, the match endpoint on our existing API includes a confidence value that indicates how likely it is the correct age rating has been found or, more pertinently, to demarcate multiple results where a single match cannot be returned.

For the most part, this is a consequence of the lack of universally unique identifiers for much of the content to which age ratings apply. To achieve true interoperability where labels are separated from the content, there needs to be methods to ensure that one or more labels are indeed referring to the same content.

Whereas presently we provide our data in the JSON format, which is popular amongst application developers, the MIRACLE format currently lends itself to an XML representation. Although we have attempted to design the data model to be technology neutral, it remains to be seen how feasible a JSON representation will be. As far as our implementation is concerned, we will try to support both as best we can.

Proposed outcome

We will extend our existing API to include a new suite of endpoints that provide data in the MIRACLE format. These will largely attempt to mirror the endpoints for our existing API where it makes sense to do so. For example, a match endpoint will be provided. Whilst this is not strictly related to the MIRACLE format itself, it will help to address the discoverability problem referenced above.

Development will be undertaken in-house by the same IT staff that built our existing API. This member of staff is also the primary representative for the MIRACLE project for the BBFC which should ensure a smooth implementation.

At the outset, API consumers will be able to choose between an XML or JSON representation of the age rating(s) provided in the MIRACLE format.

Our developer portal will be updated with documentation for the MIRACLE compliant API and include our API explorer tool which shows the results of live queries. It will facilitate new requests for API keys which will be required for access.

In the first instance, only our traditional age rating data will be available in the MIRACLE format but during the initial implementation phase, we hope to publish data from the YouRateIt project in a similar fashion. We plan to assess the feasibility of this once the first phase of implementation is complete.

Data licensing

Whilst the majority of our data will only be available under our existing digital licence, a subset of age ratings will be made available more openly to support experimentation with the API and subsequent hackathons. This data will comprise of our catalogue of around 2000 video game age ratings published between 1986 and 2012.

It is likely that any data published from the YouRateIt project will be subject to a different licence that considers the requirements of our development partners as well as those of the BBFC.

Timescale

We expect an alpha version of our MIRACLE compliant API to be available in late January 2015, progressing to a beta release a month later in February. Development will be undertaken by internal resources by staff familiar with both the MIRACLE project and the existing API architecture. During the implementation phase, infrastructure work in the form of additional hardware and co-location will be carried out to ensure that a reliable service can be provided. We expect this to be covered by our original budget and time estimate of four person months for implementation with contingency to space to address any scalability problems.