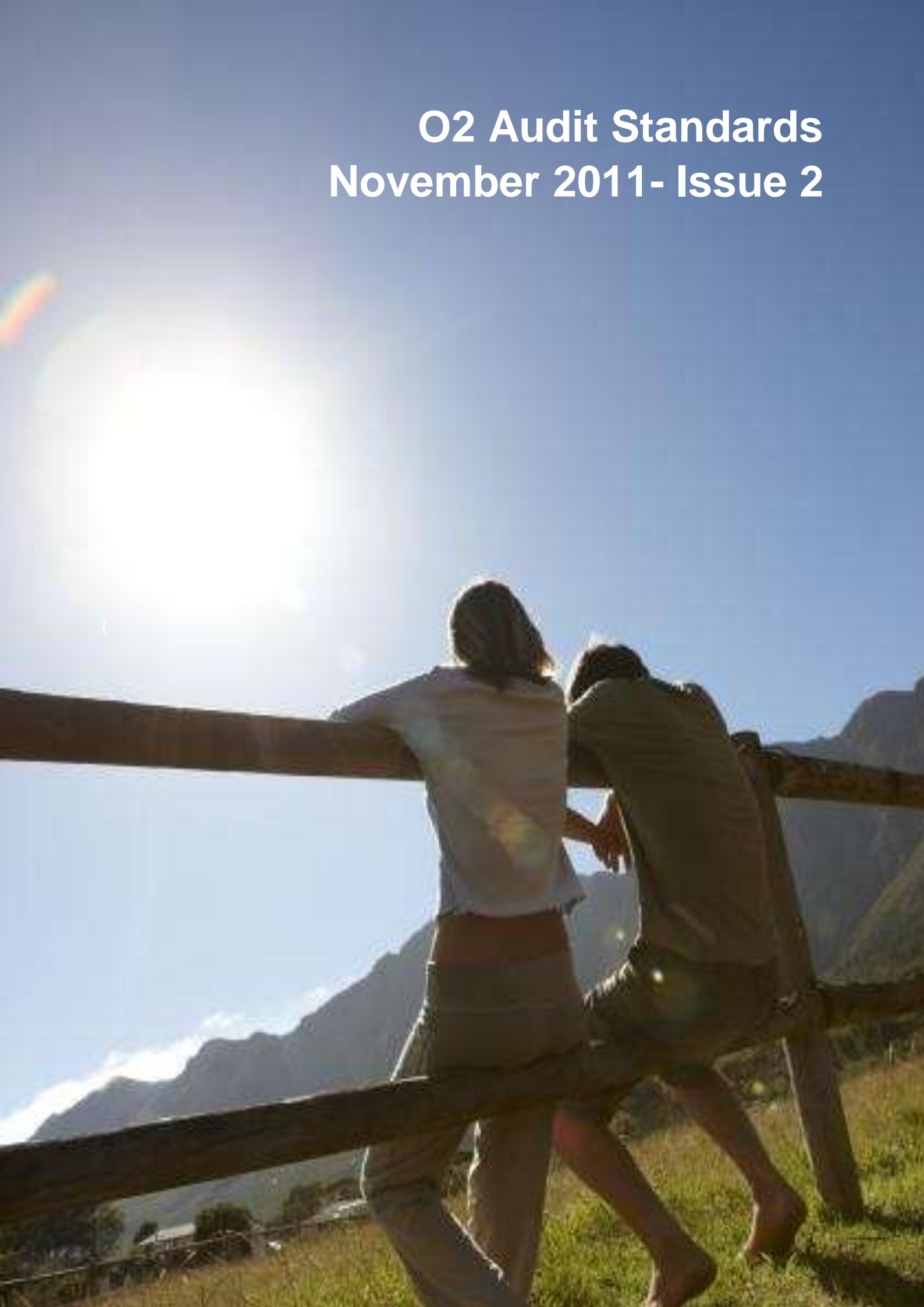


O2 Audit Standards November 2011- Issue 2



O2 have detailed our audit standards for your guidance. These have been broken down into five sections. These are liable to change, but should be used as a guide.

Section 1 – O2 Policy

Red Cards

Yellow Cards

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Section 5 – Chat Services

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Section 6 - Payforit

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Section 1 – O2 Policy

Red Cards

Yellow Cards

O2 Fines

Red Cards

A Red Card is issued where the breach is severe and could cause Brand/Customer harm. The service would need to be taken out of action immediately and remain out of action for a minimum of 10 days and only returned to service when it is confirmed compliant. An example could be an advertisement without any pricing, adult services not behind access control, no subscription disclosure details. This is classified as a Severity 1 breach in the O2 Audit Standards.

Yellow Cards

A Yellow Card is issued where the breach identified is not as severe as a Red Card and does not require immediate resolution. The breach must be resolved within 48 hours of it being identified by O2 to you. An example could be a marketing message may have omitted opt-out instructions or an advertisement that has omitted contact details. This is classified as a Severity 2 breach in the O2 Audit Standards.

O2 Fines

O2 will be introducing a system of fines in January 2012 when Red/Yellow Cards have been issued. The fines will be at the discretion of O2 and the charges will be as follows with the amounts being automatically deducted from the next revenue share payment.

Red card - £1000

Yellow card - £500

Age Verification Red card - £2000

Section 2 – Advertising

O2 Advertising Audit Standards

O2 Advertising Audit Standards

	Violations	Severity	Actions Required
Programme	Implies participation of persons under age 18 [sexual entertainment services] 2.5.1	1	Remove implication of participation by persons under age 18
	Contains foul language 2.5.1	1	Remove foul language
	Contains reference to abuse of controlled substance (e.g., alcohol, drugs, tobacco) 2.5.3	1	Remove reference to abuse of any controlled substance
	Promotes consumption of controlled substance (e.g., alcohol, drugs, tobacco) 2.5.3	1	Remove promotion for consumption of controlled substance
	Promotes racial disharmony 2.5.2	1	Remove promotion for racial disharmony
	Promotes violence, sadism, or cruelty 2.5.5	1	Remove promotion for violence, sadism, or cruelty
	Offensive or inappropriate substitute programme 2.3.2	1	Discontinue offensive or inappropriate substitute programme
	Operating unauthorised product or service 3.10.1	1	Suspend product or service until prior permission obtained
	Promotes or bills using mobile long numbers [virtual chat] 2.2.1; Virtual Chat Guidance Note 1.10	2	Discontinue promotion or use of mobile long numbers for virtual chat services
	No facility for customers to confirm acceptance of logging of personal details 2.4.3; 2.3.3	2	Implement facility for customers to confirm acceptance of logging of personal details for use in case of unauthorised use
	Lacks transparency in promoting service unrelated to service on offer 2.4.3; 2.3.3	2	State clearly all terms of service on offer and dependent ancillary services
	Failure to notify customers of age restriction§ [virtual chat] 2.3.8	2	State clearly that virtual chat customers must be age 18 or older
	Contains unverifiable claims regarding future “certain winner” or “certainty of profit” 2.3.2; Betting Tipster Guidance Note 1.2	2	Remove unverifiable claims regarding winning or profit
	Use of terms such as <i>win</i> or <i>prize</i> when describing items offered to all or most participants 2.3.2; Betting Tipster Guidance Note	2	Remove terms such as <i>win</i> or <i>prize</i> when describing items offered to all or most participants
	Presents opinion as fact 2.3.2; Betting Tipster Guidance Note 1.2	2	Remove statement of opinion
	No product or service disclosure 2.2.1	2	Disclose product or service in main body of advertisement
	Games unavailable to O2 customers 2.2.1	2	Disclose O2 participation in main body of advertisement
	Binary unavailable to O2 customers 2.2.1	2	Disclose O2 participation in main body of advertisement
	Videos unavailable to O2 customers 2.2.1	2	Disclose O2 participation in main body of advertisement
	Substitute programme for O2 customers 2.2.1	2	Disclose O2 participation in main body of advertisement
	Misrepresentation of product offering 2.3.2	2	Reconcile, among main body of advertisement, call-to-action, and T&Cs, all references to product type
	Misrepresentation of product quantity 2.3.2	2	Display only actual product quantity per subscription term (e.g., 15 ringtones/mo.)
	No facility for customers to enter birth date and confirm account-holder authorisation [non-virtual chat] 3.10.6	2	Implement facility for chat customers to enter birth date and confirm account-holder authorisation
Manipulates personal data to support false statements [online, £4.50/wk + subscription services] 2.3.2	2	Refrain from manipulating personal data to support false statements	
Falsely promotes virtual chat service as contact and dating service¶ 2.3.2	2	Remove suggestion that opt-in could result in face-to-face meeting, including the words “meet” and “date”	

§The only exceptions to this rule are non-adult (non-sexual entertainment) text- and picture-based virtual chat services offered to the 16–17 age group, provided that the advertising of such services occurs in media where the target readership or audience is 16 years of age or older.

¶For example, requirement to opt into a subscription horoscope service to receive IQ quiz results.

¶For example, displaying personal information such as names of customer’s friends on social networking Website.

¶ Virtual chat services may use “meet,” “date,” and similar words only if the service makes perfectly clear that participation will not result in a face-to-face meeting.

O2 Advertising Audit Standards *continued*

	Violations	Severity	Actions Required
Pricing	No pricing 2.2.1	1	Display programme pricing in main body of advertisement
	Pricing illegible or requires close examination 2.2.5	1	Increase point size, alter colour scheme to improve contrast, or both; display pricing horizontally
	Failure to display full cost of participation 2.2.1	1	Display, in main body of advertisement, full cost of participation
	Pricing not displayed adjacent to call-to-action [online] 2.2.5	1	Display pricing within three lines breaks, directly above, below, or to right or left of call-to-action, with no intervening text or graphics
	Conflicting pricing 2.2.1	2	Display correct pricing
	Unclear pricing 2.2.2	2	Display full and correct programme pricing in £
	Inappropriate use of the term <i>free</i> 2.3.2	2	Discontinue use of the term <i>free</i>
	No pricing (audio) [TV, services exceeding £3.83 plus VAT] 2.2.7	2	Articulate pricing in audio as well as displaying in video
	Pricing difficult to understand (audio) [TV] 2.2.5	2	Articulate pricing clearly
	Pricing hidden in T&Cs 2.2.5	2	Display programme pricing in main body of advertisement
Subscription	No subscription disclosure 2.2.1	1	Display subscription disclosure in main body of advertisement
	Subscription disclosure hidden in T&Cs 2.2.1	1	Display subscription disclosure in main body of advertisement
	Subscription disclosure not displayed adjacent to call-to-action [online] 2.2.1	1	Display subscription disclosure within three lines breaks, directly above, below, or to right or left of call-to-action, with no intervening text or graphics
	No subscription term 2.2.1	1	Display subscription term in main body of advertisement
	Unclear subscription term 2.2.1	1	Reconcile, among main body of advertisement, call-to-action, and T&Cs, all references to subscription term
	Subscription term hidden in T&Cs 2.2.1	2	Display subscription term in main body of advertisement
	Subscription term not displayed adjacent to call-to-action [online] 2.2.1	2	Display subscription term within three lines breaks, directly above, below, or to right or left of call-to-action, with no intervening text or graphics
T&Cs	T&Cs TV		
	Failure to place pricing and subscription disclosure and term according to O2 policy Operator Extension	2	Display prescribed text prominently in main body of ad, statically, and adjacent to main service shortcode: "Join [or Subscribe to] [service name, description optional - max 35 characters] for [service cost in £] per [billing frequency]"
	Failure to format pricing and subscription disclosure and term according to O2 policy Operator Extension	2	Format prescribed text statically as: "Join [or Subscribe to] [service name, description optional - max 35 characters] for [service cost in £] per [billing frequency]"
	Failure to articulate basic T&Cs (service name, cost, and subscription disclosure and term) according to O2 policy Operator Extension	2	Implement voiceover that articulates basic T&Cs <i>exactly</i> as prescribed: "Join [or Subscribe to] [service name, description optional] for [service cost in £] per [billing frequency]" (reference initial fee if relevant)
	Voiceover inaudible 2.2.7	2	Improve audio quality so audience can understand T&Cs clearly
	T&Cs display time too brief Operator Extension	2	Display T&Cs during 100% of advertisement airtime
	T&Cs font incorrect Operator Extension	2	Format T&Cs in same font as main service shortcode

O2 Advertising Audit Standards <i>continued</i>			
	Violations	Severity	Actions Required
T&Cs <i>continued</i>	T&Cs TV <i>continued</i>		
	T&Cs point size too small Operator Extension	2	Format T&Cs in point size at least 50% as large as shortcode point size or 30 pixels, whichever is larger
	Subscription disclosure, pricing, or both in incorrect colour Operator Extension	2	Format subscription disclosure, pricing, or both in monochrome colour and background (i.e., black on white or white on black)
	T&Cs Radio		
	Failure to articulate T&Cs (service name, cost, and subscription disclosure and term) according to O2 policy Operator Extension	2	Articulate T&Cs <i>exactly</i> as prescribed: "Join [or Subscribe to] [service name optional] for [service cost in £] per [billing frequency]" (reference initial fee if relevant)
	No URL to comprehensive T&Cs Operator Extension	2	Articulate URL to comprehensive T&Cs
	T&Cs Online and Print		
	Failure to place pricing and subscription disclosure and term according to O2 policy Operator Extension	2	Display prescribed text prominently in main body of ad, statically, and adjacent to main service shortcode: "Join [or Subscribe to] [service name optional] for [service cost in £] per [billing frequency]"
	Failure to format pricing and subscription disclosure and term according to O2 policy Operator Extension	2	Format prescribed text statically as: "Join [or Subscribe to] [service name optional] for [service cost in £] per [billing frequency]"
	Failure to format adjoining small print (pricing and subscription disclosure and term, plus opt-out information) according to O2 policy Operator Extension	2	Preface adjoining small print <i>exactly</i> as prescribed: "This is a subscription service, it will cost [£X] per [billing period] until you send STOP to [shortcode]"
	Prescribed T&Cs text not located on first page of advertisement Operator Extension	2	Display <i>on first page</i> T&Cs as prescribed: "Join [or Subscribe to] [service name optional] for [service cost in £] per [billing frequency]" (reference to initial fee if relevant)
	T&Cs font incorrect Operator Extension	2	Format T&Cs in same font as main service shortcode
	T&Cs point size too small Operator Extension	2	Format T&Cs in point size at least 50% as large as shortcode point size or 10 points, whichever is larger
	Background colour of subscription disclosure, pricing, or both incorrect Operator Extension	2	Format background of subscription disclosure, pricing, or both in same colour as shortcode background
	Insufficient details 2.2.1	2	Display clearly how competition operates, including applicable restrictions, tie-breaking procedures, description and number of major prizes, and vouchers value
	Failure to identify beneficiary 2.2.1	2	Identify beneficiary of fundraising or charitable promotion
	No opt-out information 2.3.11; Exit Method Guidance Note	2	Associate opt-out command with shortcode and preface with "Reply," "Send," or "Text"
	Incorrect opt-out information 2.3.11; Exit Method Guidance Note	2	Associate opt-out command with shortcode and preface with "Reply," "Send," or "Text"
	Unclear opt-out information 2.3.1; Exit Method Guidance Note	2	Associate opt-out command with shortcode and preface with "Reply," "Send," or "Text"
	No end date [e.g., competition services] 2.2.1; Competitions Guidance Note	2	Display end date
Failure to identify content provider 2.2.1a	2	Identify content provider clearly	
Failure to display time-accuracy statement [publications with shelf-life of 3 months or more] 2.2.1	2	State that T&Cs were correct on publication as well as publication date; disclose if charges increase during life of promotion	

Section 3 – One-off purchases

O2 One-off, Competition and Advice Services

O2 CE One-Off Purchases, Competitions, and Advice Services Advertising Audit Standards			
	Violations	Severity	Actions Required
Programme	Implies participation of persons under age 18 [sexual entertainment services] 2.5.1	1	Remove implication of participation by persons under age 18
	Contains foul language 2.5.1	1	Remove foul language
	Contains reference to abuse of controlled substance (e.g., alcohol, drugs, tobacco) 2.5.3	1	Remove reference to abuse of any controlled substance
	Promotes consumption of controlled substance (e.g., alcohol, drugs, tobacco) 2.5.3	1	Remove promotion for consumption of controlled substance
	Promotes racial disharmony 2.5.2	1	Remove promotion for racial disharmony
	Promotes violence, sadism, or cruelty 2.5.5	1	Remove promotion for violence, sadism, or cruelty
	Offensive or inappropriate substitute programme 2.3.2	1	Discontinue offensive or inappropriate substitute programme
	Programme operating on unapproved shortcode [sexual entertainment services] 2.3.7	1	Discontinue sexual entertainment service and consult O2 regarding service launch on approved shortcode
	Operating unauthorised product or service 3.10.1	1	Suspend product or service until prior permission obtained
	No facility for customers to confirm acceptance of logging of personal details 2.4.3; 2.3.3	2	Implement facility for customers to confirm acceptance of logging of personal details for use in case of unauthorised use
	Contains unverifiable claims regarding future "certain winner" or "certainty of profit" 2.3.2; Betting Tipster Guidance Note 1.2	2	Remove unverifiable claims regarding winning or profit
	Use of terms such as <i>win</i> or <i>prize</i> when describing items offered to all or most participants 2.3.2; Betting Tipster Guidance Note	2	Remove terms such as <i>win</i> or <i>prize</i> when describing items offered to all or most participants
	Presents opinion as fact 2.3.2; Betting Tipster Guidance Note 1.2	2	Remove statement of opinion
	No product or service disclosure 2.2.1	2	Disclose product or service in main body of advertisement
	Games unavailable to O2 customers 2.2.1	2	Disclose O2 participation in main body of advertisement
	Binary unavailable to O2 customers 2.2.1	2	Disclose O2 participation in main body of advertisement
	Videos unavailable to O2 customers 2.2.1	2	Disclose O2 participation in main body of advertisement
	Substitute programme for O2 customers 2.2.1	2	Disclose O2 participation in main body of advertisement
Misrepresentation of product offering 2.3.2	2	Reconcile, among main body of advertisement, call-to-action, and T&Cs, all references to product type	
Misrepresentation of product quantity 2.3.2	2	Display only actual product quantity per subscription term (e.g., 15 ringtones/mo.)	
Pricing	No pricing 2.2.1	1	Display programme pricing in main body of advertisement
	Pricing illegible or requires close examination 2.2.5	1	Increase point size, alter color scheme to improve contrast, or both; display pricing horizontally
	Failure to display full cost of participation 2.2.1	1	Display, in main body of advertisement, full cost of participation
	Pricing not displayed adjacent to call-to-action [online] 2.2.5	1	Display pricing within three lines breaks, directly above, below, or to right or left of call-to-action, with no intervening text or graphics
	Conflicting pricing 2.2.1	2	Display correct pricing
	Unclear pricing 2.2.2	2	Display full and correct programme pricing in £
	Inappropriate use of the term <i>free</i> 2.3.2	2	Discontinue use of the term <i>free</i>
	No pricing (audio) [TV services exceeding £3.83 plus VAT] 2.2.7	2	Articulate pricing in audio as well as displaying in video
	Pricing difficult to understand (audio) [TV] 2.2.5	2	Articulate pricing clearly
	Pricing hidden in T&Cs 2.2.5	2	Display programme pricing in main body of advertisement

ψCite when missing from both advertising and messaging before customer is charged. We assume charges are imposed when the customer has opted into the program.

O2 CE One-Off Purchases, Competitions, and Advice Services Advertising Audit Standards <i>continued</i>			
	Violations	Severity	Actions Required
T&Cs	Insufficient details ^ψ 2.2.1	2	Display clearly how competition operates, including applicable restrictions, tie-breaking procedures, description and number of major prizes, and vouchers value
	Failure to identify beneficiary 2.2.1	2	Identify beneficiary of fundraising or charitable promotion
	No end date [e.g., competition services] 2.2.1 ; Competitions Guidance Note	2	Display end date
	Failure to identify content provider ^ψ 2.2.1a	2	Identify content provider clearly
	Prechecked T&Cs acceptance 2.4.2	2	Uncheck T&Cs acceptance box
Failure to display time-accuracy statement [publications with shelf-life of 3 months or more] 2.2.1	2	State that T&Cs were correct on publication as well as publication date; disclose if charges increase during life of promotion	

^ψCite when missing from both advertising and messaging before customer is charged. We assume charges are imposed when the customer has opted into the program.

O2 CE One-Off Purchases, Competitions, and Advice Services Message Flow Audit Standards

		<i>Violations</i>	<i>Severity</i>	<i>Actions Required</i>
Opt-In and Confirmation	Programme	Substitute programme 2.2.1	1	Replace substitute programme with advertised programme
		Failure to identify programme 2.2.1	2	Display programme name
		Failure to identify programme clearly 2.2.1	2	Choose one programme name and cite it consistently throughout message flow
		Failure to provide adequate information about how the service works 2.2.1	2	Provide adequate information about how the service works
		Failure to require active confirmation from customers that they accept their personal details will be retained 2.4.3; 2.3.3	2	Require active confirmation that customers accept their personal details will be retained
	Pricing	No pricing ^ψ 2.2.1	1	Display programme pricing
		Conflicting pricing ^ψ 2.2.1	2	Reconcile, among all messages and advertisement, references to pricing
		Unclear pricing ^ψ 2.2.1	2	Display full and correct programme pricing in £
		Inappropriate use of the term <i>free</i> 2.3.2	2	Discontinue use of the term <i>free</i>
	T&Cs	No disclosure that advice is not dispensed by a qualified practitioner ^ψ [professional advice services] 3.10.6	2	Disclose clearly that customer should refrain from acting on advice without first consulting a qualified practitioner
		Failure to indicate clearly the identity, current status and any relevant professional qualifications or experience of person or organization ^ψ [professional advice services] 3.10.6	2	Indicate clearly the identity, current status and any relevant professional qualifications or experience of person or organization
		No free or non-premium rate UK Helpline, staffed throughout normal UK office hours ^ψ 2.2.1a	2	Display free or non-premium rate UK Helpline number
Marketing	Programme	Unauthorised marketing message or messages 2.4.1; Privacy and Consent to Charge Guidance Note	1	Refrain from sending marketing messages to customers who decline option or opt out
		Failure to preface marketing message with "FreeMsg" Operator Extension	2	Preface all marketing messages with "FreeMsg"
	Pricing	No pricing 2.2.1	1	Display programme pricing
		Unclear pricing 2.2.2	2	Display full and correct programme pricing in £
		Inappropriate use of the term <i>free</i> 2.3.2	2	Discontinue use of the term <i>free</i>
	T&Cs	No marketing message opt-out information 2.4.1; Privacy and Consent to Charge Guidance Note 5.1	2	Associate opt-out command with shortcode and preface with "Reply," "Send," or "Text"
		Unclear marketing message opt-out information 2.4.1; Privacy and Consent to Charge Guidance Note 5.1	2	Associate opt-out command with shortcode and preface with "Reply," "Send," or "Text"

^ψCite when missing from both advertising and messaging before customer is charged. We assume charges are imposed when the customer has opted into the program.

Section 4 – Subscription Services

O2 Subscriptions £4.50wk and under

O2 Subscriptions £4.51wk and over

O2 CE Subscriptions £4.50/Week and Under Advertising Audit Standards			
	Violations	Severity	Actions Required
Programme	Contains foul language 2.5.1	1	Remove foul language
	Contains reference to abuse of controlled substance (e.g., alcohol, drugs, tobacco) 2.5.3	1	Remove reference to abuse of any controlled substance
	Promotes consumption of controlled substance (e.g., alcohol, drugs, tobacco) 2.5.3	1	Remove promotion for consumption of controlled substance
	Promotes racial disharmony 2.5.2	1	Remove promotion for racial disharmony
	Promotes violence, sadism, or cruelty 2.5.5	1	Remove promotion for violence, sadism, or cruelty
	Offensive or inappropriate substitute programme 2.3.2	1	Discontinue offensive or inappropriate substitute programme
	Programme operating on unapproved shortcode [sexual entertainment services] 2.3.7	1	Discontinue sexual entertainment service and consult O2 regarding service launch on approved shortcode
	Operating unauthorised product or service 3.10.1	1	Suspend product or service until prior permission obtained
	No product or service disclosure 2.2.1	2	Disclose product or service in main body of advertisement
	Games unavailable to O2 customers 2.2.1	2	Disclose O2 participation in main body of advertisement
	Binary unavailable to O2 customers 2.2.1	2	Disclose O2 participation in main body of advertisement
	Videos unavailable to O2 customers 2.2.1	2	Disclose O2 participation in main body of advertisement
	Substitute programme for O2 customers 2.2.1	2	Disclose O2 participation in main body of advertisement
	Misrepresentation of product offering 2.3.2	2	Reconcile, among main body of advertisement, call-to-action, and T&Cs, all references to product type
	Misrepresentation of product quantity 2.3.2	2	Display only actual product quantity per subscription term (e.g., 15 ringtones/mo.)
Pricing	No pricing 2.2.1	1	Display programme pricing in main body of advertisement
	Pricing not displayed adjacent to call-to-action [online] 2.2.5	1	Display pricing within three lines breaks, directly above, below, or to right or left of call-to-action, with no intervening text or graphics
	Conflicting pricing 2.2.1	2	Display correct pricing
	Unclear pricing 2.2.2	2	Display full and correct programme pricing in £
	Inappropriate use of the term free 3.10.6	2	Discontinue use of the term free
	Pricing hidden in T&Cs 2.2.5	2	Display programme pricing in main body of advertisement
Subscription	No subscription disclosure 2.2.1	1	Display subscription disclosure in main body of advertisement
	Subscription disclosure hidden in T&Cs 2.2.1	1	Display subscription disclosure in main body of advertisement
	Subscription disclosure not displayed adjacent to call-to-action [online] 2.2.1	1	Display subscription disclosure within three lines breaks, directly above, below, or to right or left of call-to-action, with no intervening text or graphics
	No subscription term 2.2.1	1	Display subscription term in main body of advertisement
	Unclear subscription term 2.2.1	1	Reconcile, among main body of advertisement, call-to-action, and T&Cs, all references to subscription term
	Subscription term hidden in T&Cs 2.2.1	2	Display subscription term in main body of advertisement
	Subscription term not displayed adjacent to call-to-action [online] 2.2.1	2	Display subscription term within three lines breaks, directly above, below, or to right or left of call-to-action, with no intervening text or graphics

O2 CE Subscriptions £4.50/Week and Under Advertising Audit Standards <i>continued</i>			
	Violations	Severity	Actions Required
T&Cs	T&Cs TV		
	Failure to place pricing and subscription disclosure and term according to O2 policy Operator Extension	2	Display prescribed text prominently in main body of ad, statically, and adjacent to main service shortcode: "Join [or Subscribe to] [service name, description optional - max 35 characters] for [service cost in £] per [billing frequency]"
	Failure to format pricing and subscription disclosure and term according to O2 policy Operator Extension	2	Format prescribed text statically as: "Join [or Subscribe to] [service name, description optional - max 35 characters] for [service cost in £] per [billing frequency]"
	Failure to articulate basic T&Cs (service name, cost, and subscription disclosure and term) according to O2 policy Operator Extension	2	Implement voiceover that articulates basic T&Cs <i>exactly</i> as prescribed: "Join [or Subscribe to] [service name, description optional] for [service cost in £] per [billing frequency]" (reference initial fee if relevant)
	Voiceover inaudible 2.2.7	2	Improve audio quality so audience can understand clearly
	T&Cs display time too brief Operator Extension	2	Display T&Cs during 100% of advertisement airtime
	T&Cs font incorrect Operator Extension	2	Format T&Cs in same font as main service shortcode
	T&Cs point size too small Operator Extension	2	Format T&Cs in point size at least 50% as large as shortcode point size or 30 pixels, whichever is larger
	Subscription disclosure, pricing, or both in incorrect colour Operator Extension	2	Format subscription disclosure, pricing, or both in monochrome colour and background (i.e., black on white or white on black)
	T&Cs Radio		
	Failure to articulate T&Cs (service name, cost, and subscription disclosure and term) according to O2 policy Operator Extension	2	Articulate T&Cs <i>exactly</i> as prescribed: "Join [or Subscribe to] [service name optional] for [service cost in £] per [billing frequency]" (reference initial fee if relevant)
	No URL to comprehensive T&Cs Operator Extension	2	Articulate URL to comprehensive T&Cs
	T&Cs Online and Print		
	Failure to place pricing and subscription disclosure and term according to O2 policy Operator Extension	2	Display prescribed text prominently in main body of ad, statically, and adjacent to main service shortcode: "Join [or Subscribe to] [service name optional] for [service cost in £] per [billing frequency]"
	Failure to format pricing and subscription disclosure and term according to O2 policy Operator Extension	2	Format prescribed text statically as: "Join [or Subscribe to] [service name optional] for [service cost in £] per [billing frequency]"
	Failure to format adjoining small print (pricing and subscription disclosure and term, plus opt-out information) according to O2 policy Operator Extension	2	Preface adjoining small print <i>exactly</i> as prescribed: "This is a subscription service, it will cost [£X] per [billing period] until you send STOP to [shortcode]"
	Prescribed T&Cs text not located on first page of advertisement Operator Extension	2	Display <i>on first page</i> T&Cs as prescribed: "Join [or Subscribe to] [service name optional] for [service cost in £] per [billing frequency]" (reference to initial fee if relevant)
	T&Cs font incorrect Operator Extension	2	Format T&Cs in same font as main service shortcode
	T&Cs point size too small Operator Extension	2	Format T&Cs in point size at least 50% as large as shortcode point size or 10 points, whichever is larger
	Background colour of subscription disclosure, pricing, or both incorrect Operator Extension	2	Format background of subscription disclosure, pricing, or both in same colour as shortcode background
	Failure to identify beneficiary 2.2.1	2	Identify beneficiary of fundraising or charitable promotion
	No opt-out information 2.3.11; Exit Method Guidance Note	2	Associate opt-out command with shortcode and preface with "Reply," "Send," or "Text"
	Incorrect opt-out information 2.3.11; Exit Method Guidance Note	2	Associate opt-out command with shortcode and preface with "Reply," "Send," or "Text"
	Unclear opt-out information 2.3.11; Exit Method Guidance Note	2	Associate opt-out command with shortcode and preface with "Reply," "Send," or "Text"
	Failure to identify content provider 2.2.1a	2	Identify content provider clearly
	Prechecked T&Cs acceptance [online] 2.4.2	2	Uncheck T&Cs acceptance box
	Failure to display time-accuracy statement [publications with shelf-life of 3 months or more] 2.2.1	2	State that T&Cs were correct on publication as well as publication date; disclose if charges increase during life of promotion

O2 CE Subscriptions £4.50/Week and Under Message Flow Audit Standards				
		Violations	Severity	Actions Required
Opt-In	Programme	Failure to send opt-in message§ [online] 2.3.3; Operator Extension 2.2	1	Send opt-in message, instructing customer to send MO message to shortcode or to reply affirmatively (e.g., "OK," "Accept," "Yes")
Subscription Confirmation	Programme	Failure to send confirmation message 2.3.3; Operator Extension 2.2	1	Send message: "U have joined [or subscribed to] [service name, max 35 characters] for [cost in £] per [billing frequency] until you send STOP to [originating shortcode]. Helpline [free or standard rate UK number]"
		Substitute programme 2.2.1	1	Replace substitute programme with advertised programme
		Programme operating on unapproved shortcode [sexual entertainment services] 2.3.7	1	Discontinue sexual entertainment service and consult O2 regarding service launch on approved shortcode
		Failure to format confirmation message according to O2 policy Operator Extension 2.2	2	Display message as: "U have joined [or subscribed to] [service name, max 35 characters] for [cost in £] per [billing frequency] until you send STOP to [originating shortcode]. Helpline [free or standard rate UK number]"
		Failure to preface confirmation message with "FreeMsg" [billed message only] Operator Extension 2.2	2	Preface confirmation message with "FreeMsg"
		Misrepresentation of product offering 2.3.2	2	Reconcile, among main body of advertisement, call-to-action, and T&Cs, all references to product type
		Misrepresentation of product quantity 2.3.2	2	Display only actual product quantity per subscription term (e.g., 15 ringtones/mo.)
		Failure to display service name 2.2.1	2	Display service name
	Pricing	No pricing 2.2.1	1	Display programme pricing
		Conflicting pricing 2.2.1	2	Reconcile, among all messages and advertisement, references to pricing
		Unclear pricing 2.2.2	2	Display full and correct programme pricing in £
		Inappropriate use of the term free 3.10.6	2	Discontinue use of the term free
	Subscription	No subscription disclosure 2.2.1	1	Display subscription disclosure
		No billing frequency 2.2.1	1	Display billing frequency
	T&Cs	No opt-out information 2.3.11; Exit Method Guidance Note	2	Associate opt-out command with shortcode and preface with "Reply," "Send," or "Text"
		Unclear opt-out information 2.3.11; Exit Method Guidance Note	2	Associate opt-out command with shortcode and preface with "Reply," "Send," or "Text"
		No free or non-premium rate UK Helpline, staffed throughout normal UK office hours 2.2.1a	2	Display free or non-premium rate UK Helpline number

§Subscription services £4.50/week and under employing social media-linked profiles are exempt from the requirement to send an opt-in message.

O2 CE Subscriptions £4.50/Week and Under Message Flow Audit Standards *continued*

	Violations	Severity	Actions Required	
Monthly Subscription Reminder	Programme	Failure to send subscription reminder message 2.3.12d	1	Send subscription reminder message monthly or every time customer has spent £17.04 excluding VAT within calendar month
		Failure to format subscription reminder message according to O2 policy Operator Extension	1	Display message as: "U are subscribed to [service name, max 35 characters] for [cost in £] per [billing frequency] until you send STOP to [originating service shortcode]. Helpline [free or standard rate UK number]"
		Failure to locate prescribed text at beginning of subscription reminder message Operator Extension	1	Display prescribed text (" U are subscribed to [service name, max 35 characters] for [cost in £] per [billing frequency] Helpline [free or standard rate UK number]") at beginning of subscription reminder message
		No product or service disclosure 2.2.1	2	Disclose product or service
		Failure to preface subscription reminder message with "FreeMsg" Operator Extension	2	Preface subscription reminder message with "FreeMsg"
	Pricing	No pricing 2.2.1	1	Display programme pricing
		Conflicting pricing 2.2.1	2	Reconcile, among all messages and advertisement, references to pricing
		Unclear pricing 2.2.2	2	Display full and correct programme pricing in £
	Subscription	No subscription disclosure 2.2.1	1	Display subscription disclosure
		No billing frequency 2.2.1	1	Display billing frequency
	T&Cs	No service provider contact details 2.3.12dvi	1	Display service provider contact details
		No opt-out information 2.3.11; Exit Method Guidance Note	2	Associate opt-out command with shortcode and preface with "Reply," "Send," or "Text"
		Unclear opt-out information 2.3.11; Exit Method Guidance Note	2	Associate opt-out command with shortcode and preface with "Reply," "Send," or "Text"
Marketing	Programme	Unauthorised marketing message or messages 2.4.1; Privacy and Consent to Charge Guidance Note	1	Refrain from sending marketing messages to customers who decline option or opt out
		Failure to preface marketing message with "FreeMsg" Operator Extension	2	Preface all marketing messages with "FreeMsg"
	Pricing	No pricing 2.2.1	1	Display programme pricing
		Unclear pricing 2.2.2	2	Display full and correct programme pricing in £
		Inappropriate use of the term free 2.3.2	2	Discontinue use of the term free
	T&Cs	No marketing message opt-out information 2.4.1; Privacy and Consent to Charge Guidance Note 5.1	2	Associate opt-out command with shortcode and preface with "Reply," "Send," or "Text"
Unclear marketing message opt-out information 2.4.1; Privacy and Consent to Charge Guidance Note 5.1		2	Associate opt-out command with shortcode and preface with "Reply," "Send," or "Text"	
STOP Confirmation	Programme	Failure to terminate service when customer sends STOP command 2.3.11; Exit Method Guidance Note	1	Terminate service immediately when customer sends STOP command
		STOP command case sensitive 2.3.11; Exit Method Guidance Note	1	Recognise STOP command regardless of text case
		Customer STOP message with subsequent text not recognized 2.3.11; Exit Method Guidance Note	2	Ignore subsequent text in customer STOP message
		Failure to respond to customer message to STOP service Operator Extension 2.5	2	Send message informing customer that service has been terminated and that no more messages will be sent
		Failure to preface STOP confirmation message with "FreeMsg" Operator Extension	2	Preface STOP confirmation message with "FreeMsg"

O2 CE Subscriptions £4.51/Week and Over Advertising Audit Standards			
	Violations	Severity	Actions Required
Programme	Contains foul language 2.5.1	1	Remove foul language
	Contains reference to abuse of controlled substance (e.g., alcohol, drugs, tobacco) 2.5.3	1	Remove reference to abuse of any controlled substance
	Promotes consumption of controlled substance (e.g., alcohol, drugs, tobacco) 2.5.3	1	Remove promotion for consumption of controlled substance
	Promotes racial disharmony 2.5.2	1	Remove promotion for racial disharmony
	Promotes violence, sadism, or cruelty 2.5.5	1	Remove promotion for violence, sadism, or cruelty
	Offensive or inappropriate substitute programme 2.3.2	1	Discontinue offensive or inappropriate substitute programme
	Programme operating on unapproved shortcode [sexual entertainment services] 2.3.7	1	Discontinue sexual entertainment service and consult O2 regarding service launch on approved shortcode
	Operating unauthorised product or service 3.10.1	1	Suspend product or service until prior permission obtained
	No product or service disclosure 2.2.1	2	Disclose product or service in main body of advertisement
	Games unavailable to O2 customers 2.2.1	2	Disclose O2 participation in main body of advertisement
	Binary unavailable to O2 customers 2.2.1	2	Disclose O2 participation in main body of advertisement
	Videos unavailable to O2 customers 2.2.1	2	Disclose O2 participation in main body of advertisement
	Substitute programme for O2 customers 2.2.1	2	Disclose O2 participation in main body of advertisement
	Misrepresentation of product offering 2.3.2	2	Reconcile, among main body of advertisement, call-to-action, and T&Cs, all references to product type
	Misrepresentation of product quantity 2.3.2	2	Display only actual product quantity per subscription term (e.g., 15 ringtones/mo.)
	Lacks transparency in promoting service unrelated to service on offer 2.4.3; 2.3.3	2	State clearly all terms of service on offer and dependent ancillary services
Manipulates personal data to support false statements 2.3.2	2	Refrain from manipulating personal data to support false statements	
Pricing	No pricing 2.2.1	1	Display programme pricing in main body of advertisement
	Pricing not displayed adjacent to call-to-action 2.2.5	1	Display pricing within three lines breaks, directly above, below, or to right or left of call-to-action, with no intervening text or graphics
	Conflicting pricing 2.2.1	2	Display correct pricing
	Unclear pricing 2.2.2	2	Display full and correct programme pricing in £
	Inappropriate use of the term <i>free</i> 3.10.6	2	Discontinue use of the term <i>free</i>
	Pricing hidden in T&Cs 2.2.5	2	Display programme pricing in main body of advertisement
Subscription	No subscription disclosure 2.2.1	1	Display subscription disclosure in main body of advertisement
	Subscription disclosure hidden in T&Cs 2.2.1	1	Display subscription disclosure in main body of advertisement
	Subscription disclosure not displayed adjacent to call-to-action [online] 2.2.1	1	Display subscription disclosure within three lines breaks, directly above, below, or to right or left of call-to-action, with no intervening text or graphics
	No subscription term 2.2.1	1	Display subscription term in main body of advertisement
	Unclear subscription term 2.2.1	1	Reconcile, among main body of advertisement, call-to-action, and T&Cs, all references to subscription term
	Subscription term hidden in T&Cs 2.2.1	2	Display subscription term in main body of advertisement
	Subscription term not displayed adjacent to call-to-action [online] 2.2.1	2	Display subscription term within three lines breaks, directly above, below, or to right or left of call-to-action, with no intervening text or graphics

ψ For example, requirement to opt into a subscription horoscope service to receive IQ quiz results.

¥ Displaying personal information such as, for example, names of customer's friends on a social networking Website.

O2 CE Subscriptions £4.51/Week and Over Advertising Audit Standards *continued*

	Violations	Severity	Actions Required
T&Cs	T&Cs TV		
	Failure to place pricing and subscription disclosure and term according to O2 policy Operator Extension	2	Display prescribed text prominently in main body of ad, statically, and adjacent to main service shortcode: "Join [or Subscribe to] [service name, description optional - max 35 characters] for [service cost in £] per [billing frequency]"
	Failure to format pricing and subscription disclosure and term according to O2 policy Operator Extension	2	Format prescribed text statically as: "Join [or Subscribe to] [service name, description optional - max 35 characters] for [service cost in £] per [billing frequency]"
	Failure to articulate basic T&Cs (service name, cost, and subscription disclosure and term) according to O2 policy Operator Extension	2	Implement voiceover that articulates basic T&Cs <i>exactly</i> as prescribed: "Join [or Subscribe to] [service name, description optional] for [service cost in £] per [billing frequency]" (reference initial fee if relevant)
	Voiceover inaudible 2.2.7	2	Improve audio quality so audience can understand clearly
	T&Cs display time too brief Operator Extension	2	Display T&Cs during 100% of advertisement airtime
	T&Cs font incorrect Operator Extension	2	Format T&Cs in same font as main service shortcode
	T&Cs point size too small Operator Extension	2	Format T&Cs in point size at least 50% as large as shortcode point size or 30 pixels, whichever is larger
	Subscription disclosure, pricing, or both in incorrect colour Operator Extension	2	Format subscription disclosure, pricing, or both in monochrome colour and background (i.e., black on white or white on black)
	T&Cs Radio		
	Failure to articulate T&Cs (service name, cost, and subscription disclosure and term) according to O2 policy Operator Extension	2	Articulate T&Cs <i>exactly</i> as prescribed: "Join [or Subscribe to] [service name optional] for [service cost in £] per [billing frequency]" (reference initial fee if relevant)
	No URL to comprehensive T&Cs Operator Extension	2	Articulate URL to comprehensive T&Cs
	T&Cs Online and Print		
	Failure to place pricing and subscription disclosure and term according to O2 policy Operator Extension	2	Display prescribed text prominently in main body of ad, statically, and adjacent to main service shortcode: "Join [or Subscribe to] [service name optional] for [service cost in £] per [billing frequency]"
	Failure to format pricing and subscription disclosure and term according to O2 policy Operator Extension	2	Format prescribed text statically as: "Join [or Subscribe to] [service name optional] for [service cost in £] per [billing frequency]"
	Failure to format adjoining small print (pricing and subscription disclosure and term, plus opt-out information) according to O2 policy Operator Extension	2	Preface adjoining small print <i>exactly</i> as prescribed: "This is a subscription service, it will cost [£X] per [billing period] until you send STOP to [shortcode]"
	Prescribed T&Cs text not located on first page of advertisement Operator Extension	2	Display <i>on first page</i> T&Cs as prescribed: "Join [or Subscribe to] [service name optional] for [service cost in £] per [billing frequency]" (reference to initial fee if relevant)
	T&Cs font incorrect Operator Extension	2	Format T&Cs in same font as main service shortcode
	T&Cs point size too small Operator Extension	2	Format T&Cs in point size at least 50% as large as shortcode point size or 10 points, whichever is larger
	Background colour of subscription disclosure, pricing, or both incorrect Operator Extension	2	Format background of subscription disclosure, pricing, or both in same colour as shortcode background
	Failure to identify beneficiary 2.2.1	2	Identify beneficiary of fundraising or charitable promotion
	Failure to display time-accuracy statement [publications with shelf-life of 3 months or more] 2.2.1	2	State that T&Cs were correct on publication as well as publication date; disclose if charges increase during life of promotion
	No opt-out information 2.3.11; Exit Method Guidance Note	2	Associate opt-out command with shortcode and preface with "Reply," "Send," or "Text"
	Incorrect opt-out information 2.3.11; Exit Method Guidance Note	2	Associate opt-out command with shortcode and preface with "Reply," "Send," or "Text"
	Unclear opt-out information 2.3.11; Exit Method Guidance Note	2	Associate opt-out command with shortcode and preface with "Reply," "Send," or "Text"
	Failure to identify content provider 2.2.1a	2	Identify content provider clearly
	Prechecked T&Cs acceptance [online] 2.4.2	2	Uncheck T&Cs acceptance box

O2 CE Subscriptions £4.51/Week and Over Message Flow Audit Standards

	Violations	Severity	Actions Required	
Opt-In	Programme	Failure to send free opt-in message 3.10.6; Operator Extension 2.2	1	Send opt-in message, instructing customer to send MO message to shortcode or to reply affirmatively (e.g., "OK," "Accept," "Yes")
		Substitute programme 2.2.1	1	Replace substitute programme with advertised programme
		Programme operating on unapproved shortcode [sexual entertainment services] 2.3.7	1	Discontinue sexual entertainment service and consult O2 regarding service launch on approved shortcode
		Failure to format opt-in message according to PhonepayPlus rules 3.10.6	2	Format opt-in message according to PhonepayPlus rules
		Misrepresentation of product offering 2.3.2	2	Reconcile, among main body of advertisement, call-to-action, and T&Cs, all references to product type
		Misrepresentation of product quantity 2.3.2	2	Display only actual product quantity per subscription term (e.g., 15 ringtones/mo.)
		Failure to display service name 2.2.1	2	Display service name
	Pricing	No pricing 2.2.1	1	Display programme pricing
		Conflicting pricing 2.2.1	1	Reconcile, among all messages and advertisement, references to pricing, to clarify whether pricing is over or under £4.50/week
			2	Reconcile, among all messages and advertisement, references to pricing
		Unclear pricing 2.2.2 Inappropriate use of the term free 3.10.6	2	Display full and correct programme pricing in £ Discontinue use of the term free
	Subscription	No subscription disclosure 2.2.1	1	Display subscription disclosure
		No billing frequency 2.2.1	1	Display billing frequency
	T&Cs	No opt-out information 2.3.11; Exit Method Guidance Note	2	Associate opt-out command with shortcode and preface with "Reply," "Send," or "Text"
		Unclear opt-out information 2.3.11; Exit Method Guidance Note	2	Associate opt-out command with shortcode and preface with "Reply," "Send," or "Text"
No free or non-premium rate UK Helpline, staffed throughout normal UK office hours 2.2.1a		2	Display free or non-premium rate UK Helpline number	
Conf.	Programme	Failure to require double opt-in 3.10.6	1	Require customer to reply with response command to opt-in message before sending billed MT
Monthly Subscription Reminder	Programme	Failure to send subscription reminder message 2.3.12d	1	Send subscription reminder message monthly or every time customer has spent £20 within calendar month
		Failure to format subscription reminder message according to O2 policy Operator Extension	1	Display message as: "U are subscribed to [service name, max 35 characters] for [cost in £] per [billing frequency] until you send STOP to [originating service shortcode]. Helpline [free or standard rate UK number]"
		Failure to locate prescribed text at beginning of subscription reminder message Operator Extension	1	Display prescribed text ("U are subscribed to [service name, max 35 characters] for [cost in £] per [billing frequency] Helpline [free or standard rate UK number]") at beginning of subscription reminder
		No product or service disclosure 2.2.1	2	Disclose product or service
		Failure to preface subscription reminder message with "FreeMsg" Operator Extension	2	Preface subscription reminder message with "FreeMsg"

O2 CE Subscriptions £4.51/Week and Over Message Flow Audit Standards *continued*

	Violations	Severity	Actions Required
Monthly Subscription Reminder	Pricing	No pricing 2.2.1	1 Display programme pricing
		Conflicting pricing 2.2.1	2 Reconcile, among all messages and advertisement, references to pricing
		Unclear pricing 2.2.2	2 Display full and correct programme pricing in £
	Subscription	No subscription disclosure 2.2.1	1 Display subscription disclosure
		No billing frequency 2.2.1	1 Display billing frequency
	T&Cs	No service provider contact details 2.3.12dvi	1
No opt-out information 2.3.11; Exit Method Guidance Note		2	Associate opt-out command with shortcode and preface with "Reply," "Send," or "Text"
Unclear opt-out information 2.3.11; Exit Method Guidance Note		2	Associate opt-out command with shortcode and preface with "Reply," "Send," or "Text"
Marketing	Programme	Unauthorised marketing message or messages 2.4.1; Privacy and Consent to Charge Guidance Note	1 Refrain from sending marketing messages to customers who decline option or opt out
		Failure to preface marketing message with "FreeMsg" Operator Extension	2 Preface all marketing messages with "FreeMsg"
	Pricing	No pricing 2.2.1	1 Display programme pricing
		Unclear pricing 2.2.2	2 Display full and correct programme pricing in £
		Inappropriate use of the term <i>free</i> 2.3.2	2 Discontinue use of the term <i>free</i>
	T&Cs	No marketing message opt-out information 2.4.1; Privacy and Consent to Charge Guidance Note 5.1	2 Associate opt-out command with shortcode and preface with "Reply," "Send," or "Text"
Unclear marketing message opt-out information 2.4.1; Privacy and Consent to Charge Guidance Note 5.1		2 Associate opt-out command with shortcode and preface with "Reply," "Send," or "Text"	
STOP Confirmation	Programme	Failure to terminate service when customer sends STOP command 2.3.11; Exit Method Guidance Note	1 Terminate service immediately when customer sends STOP command
		STOP command case sensitive 2.3.11; Exit Method Guidance Note	1 Recognise STOP command regardless of text case
		Customer STOP message with subsequent text not recognized 2.3.11; Exit Method Guidance Note	2 Ignore subsequent text in customer STOP message
		Failure to respond to customer message to STOP service Operator Extension 2.5	2 Send message informing customer that service has been terminated and that no more messages will be sent
		Failure to preface STOP confirmation message with "FreeMsg" Operator Extension	2 Preface STOP confirmation message with "FreeMsg"

Section 5 – Chat Services

O2 Virtual Chat and Contact and Dating Services

O2 CE Virtual Chat and Contact and Dating Services Advertising Audit Standards			
	Violations	Severity	Actions Required
Programme	Implies participation of persons under age 18 [sexual entertainment services] 2.5.1	1	Remove implication of participation by persons under age 18
	Contains foul language 2.5.1	1	Remove foul language
	Contains reference to abuse of controlled substance (e.g., alcohol, drugs, tobacco) 2.5.3	1	Remove reference to abuse of any controlled substance
	Promotes consumption of controlled substance (e.g., alcohol, drugs, tobacco) 2.5.3	1	Remove promotion for consumption of controlled substance
	Promotes racial disharmony 2.5.2	1	Remove promotion for racial disharmony
	Promotes violence, sadism, or cruelty 2.5.5	1	Remove promotion for violence, sadism, or cruelty
	Offensive or inappropriate substitute programme 2.3.2	1	Discontinue offensive or inappropriate substitute programme
	Programme operating on unapproved shortcode [sexual entertainment services] 2.3.7	1	Discontinue sexual entertainment service and consult O2 regarding service launch on approved shortcode
	Operating unauthorised product or service 3.10.1	1	Suspend product or service until prior permission obtained
	Publicly available elements of service contain contact details or other means of direct contact with other users [virtual chat and contact and dating services] 2.4.1; 2.5.3	1	Remove all publicly available contact details or means of direct contact with other users
	Promotes or bills using mobile long numbers [virtual chat] 2.2.1; Virtual Chat Guidance Note 1.10	2	Discontinue promotion or use of mobile long numbers for virtual chat services
	Falsely promotes virtual chat service as contact and dating service 2.3.2	2	Remove suggestion that opt-in could result in face-to-face meeting, including the words "meet" and "date"
	No product or service disclosure 2.2.1	2	Disclose product or service in main body of advertisement
	Substitute programme for O2 customers 2.2.1	2	Disclose O2 participation in main body of advertisement
	Misrepresentation of product offering 2.3.2	2	Reconcile, among main body of advertisement, call-to-action, and T&Cs, all references to product type
Misrepresentation of product quantity 2.3.2	2	Display only actual product quantity per subscription term (e.g., 15 ringtones/mo.)	
Prechecked T&Cs acceptance [online] 2.4.2	2	Uncheck T&Cs acceptance box	
Pricing	No pricing 2.2.1	1	Display programme pricing in main body of advertisement
	Pricing illegible or requires close examination 2.2.5	1	Increase point size, alter colour scheme to improve contrast, or both; display pricing horizontally
	Pricing not displayed adjacent to call-to-action 2.2.5	1	Display pricing within three lines breaks, directly above, below, or to right or left of call-to-action, with no intervening text or graphics
	Conflicting pricing 2.2.1	2	Display correct pricing
	Unclear pricing 2.2.2	2	Display full and correct programme pricing in £
	Inappropriate use of the term free 2.3.2	2	Discontinue use of the term free
	No pricing (audio) [TV, services exceeding £3.83 plus VAT] 2.2.7	2	Articulate pricing in audio as well as displaying in video
	Pricing difficult to understand (audio) [TV] 2.2.5	2	Articulate pricing clearly
	Pricing hidden in T&Cs 2.2.5	2	Display programme pricing in main body of advertisement
T&Cs	Unclear opt-out information 2.3.11	2	Associate opt-out command with shortcode and preface with "Reply," "Send," or "Text"
	Failure to identify content provider 2.2.1a	2	Identify content provider clearly
	No end date [e.g., competition services] 2.2.1; Competitions Guidance Note	2	Display end date
	Prechecked T&Cs acceptance [online] 2.4.2	2	Uncheck T&Cs acceptance box
	Failure to display time-accuracy statement [publications with shelf-life of 3 months or more] 2.2.1	2	State that T&Cs were correct on publication as well as publication date; disclose if charges increase during life of promotion

§The only exceptions to this rule are non-adult (non-sexual entertainment) text- and picture-based virtual chat services offered to the 16–17 age group, provided that the advertising of such services occurs in media where the target readership or audience 16 years of age or older.

¥ Virtual chat services may use "meet," "date," and similar words only if the service makes perfectly clear that participation will not result in a face-to-face meeting.

O2 CE Virtual Chat and Contact and Dating Services Audit Standards rev 1.1

19/10/2011

O2 PROPRIETARY AND CONFIDENTIAL

► Highlights indicate all changes and additions since the previous revision.

O2 CE Virtual Chat and Contact and Dating Services Message Flow Audit Standards

O2 CE Virtual Chat and Contact and Dating Services Message Flow Audit Standards					
	<i>Violations</i>	<i>Severity</i>	<i>Actions Required</i>		
Opt-In and Confirmation	Programme	Substitute programme 2.2.1	1	Replace substitute programme with advertised programme	
		Falsely promotes virtual chat service as contact and dating service 2.3.2	2	Remove suggestion that opt-in could result in face-to-face meeting, including the words "meet" and "date"	
		Failure to identify programme 2.2.1	2	Display programme name	
		Failure to identify programme clearly 2.2.1	2	Choose one programme name and cite it consistently throughout message flow	
	Pricing	No pricing 2.2.1	1	Display programme pricing	
		Conflicting pricing 2.2.1	2	Reconcile, among all messages and advertisement, references to pricing	
		Unclear pricing 2.2.2	2	Display full and correct programme pricing in £	
		Inappropriate use of the term <i>free</i> 2.3.2	2	Remove the term <i>free</i>	
	T&Cs	No opt-out information 2.3.11	2	Associate opt-out command with shortcode and preface with "Reply," "Send," or "Text"	
		Unclear opt-out information 2.3.11	2	Associate opt-out command with shortcode and preface with "Reply," "Send," or "Text"	
		Failure to notify customers of age restrictions [virtual chat] 2.3.8	2	State clearly that virtual chat customers must be age 18 or older	
		No facility for customers to enter birth date and confirm account-holder authorisation [contact and dating services] 3.10.6	2	Implement facility for chat customers to enter birth date and confirm account-holder authorisation	
		Failure to warn customers regarding dangers of disclosing personal details via chat [virtual chat and contact and dating services] 2.5.9	2	Display warning regarding dangers of disclosing personal details via chat	
	Content	Programme	Billed message preempting customer response to £10 spend reminder 2.3.12c	2	Refrain from billing customer for additional messages until he or she confirms intention to continue chatting
			Suggests face-to-face meeting possible [virtual chat] 2.3.2	2	Refrain from suggesting face-to-face meeting possible
		Failure to place "ADVERT" or "PROMO" before cross-promotion of other premium service 2.3.2	2	Place "ADVERT" or "PROMO" before cross-promotion of other premium service	
£10 Spend Reminder	Programme	Failure to send chat £10 spend reminder message [virtual chat] 2.3.12ci	1	Send chat spend reminder message every time customer has spent £10 within calendar month, and require customer to confirm acceptance of charges before continuing	
		Failure to require customer to confirm wish to continue [virtual chat] 2.3.12cii	1	Require customer to provide positive response to confirm wish to continue* (e.g., Reply "OK" ["Yes", "Yeah"] to continue)	
		£10 spend reminder fails to disclose service name or programme short code 2.3.2	1	Originate £10 spend reminder from programme shortcode	
		Failure to place "ADVERT" or "PROMO" before cross-promotion of other premium service [virtual chat] 2.3.2	2	Place "ADVERT" or "PROMO" before cross-promotion of other premium service	
		Failure to preface reminder message with "FreeMsg" [virtual chat] Operator Extension	2	Preface reminder message with "FreeMsg"	
	Pricing	No pricing 2.2.1	1	Display programme pricing	
		Unclear pricing 2.2.2	2	Display full and correct programme pricing in £	
	T&Cs	Unclear opt-out information 2.3.11	2	Associate opt-out command with shortcode and preface with "Reply," "Send," or "Text"	

¥ Virtual chat services may use "meet," "date," and similar words only if the service makes perfectly clear that participation will not result in a face-to-face meeting.

€ The only exceptions to this rule are non-adult (non-sexual entertainment) text- and picture-based virtual chat services offered to the 16–17 age group, provided that the advertising of such services occurs in media where the target readership or audience is 16 years of age or older.

β The £10 spend reminder message refers to paragraph 2.3.12c regarding the £8.52 plus VAT message.

φ Continuing to chat is regarded as confirmation.

O2 CE Virtual Chat and Contact and Dating Services Message Flow Audit Standards *continued*

		Violations	Severity	Actions Required
Marketing	Programme	Unauthorised marketing message or messages 2.4.1; Privacy and Consent to Charge Guidance Note	1	Refrain from sending marketing messages to customers who decline option or opt out
		Failure to preface marketing message with "FreeMsg" Operator Extension	2	Preface all marketing messages with "FreeMsg"
	Pricing	No pricing 2.2.1	1	Display programme pricing
		Unclear pricing 2.2.2	2	Display full and correct programme pricing in £
		Inappropriate use of the term <i>free</i> 2.3.2	2	Discontinue use of the term <i>free</i>
	T&Cs	No marketing message opt-out information 2.4.1; Privacy and Consent to Charge Guidance Note 5.1	2	Associate opt-out command with shortcode and preface with "Reply," "Send," or "Text"
Unclear marketing message opt-out information 2.4.1; Privacy and Consent to Charge Guidance Note 5.1		2	Associate opt-out command with shortcode and preface with "Reply," "Send," or "Text"	
STOP Confirmation	Programme	Failure to terminate service when customer sends STOP command 2.3.11; Exit Method Guidance Note	1	Terminate service immediately when customer sends STOP command
		STOP command case sensitive 2.3.11; Exit Method Guidance Note	1	Recognise STOP command regardless of text case
		Customer STOP message with subsequent text not recognised 2.3.11; Exit Method Guidance Note	2	Ignore subsequent text in customer STOP message
		Failure to respond to customer message to STOP service 2.3.11; Exit Method Guidance Note	2	Send message informing customer that service has been terminated and that no more messages will be sent
		Failure to preface STOP confirmation message with "FreeMsg" Operator Extension	2	Preface STOP confirmation message with "FreeMsg"

Section 6 – Payforit

O2 (WAP) Payforit Screen Audit Standards

O2 (Web) Payforit Screen Audit Standards

O2 Payforit Message Flow Audit Standards

O2 (WAP) Payforit Screen Audit Standards				
	Violations	Severity	Actions Required	
Programme	Failure to implement Payforit Scheme Rules v3.0 screen templates and requirements	2	Discontinue use of all previous Payforit Scheme Rules screen templates and requirements, and adopt v3.0 screen templates and requirements	
	Failure to employ correct screen templates and requirements for Payforit WAP purchases	2	Discontinue use of Payforit Web screen templates and requirements for WAP purchases, and implement Payforit WAP screen templates and requirements for WAP purchases	
		2	Discontinue use of Payforit Web Lite screen templates and requirements for WAP purchases, and implement Payforit WAP screen templates and requirements for WAP purchases	
	*Product or service unclear [all payment screens] R3.2.3	2	Display actual product or service name	
	Failure to deliver free content	2	Discontinue offer of free content	
	Content nonfunctioning	2	Discontinue delivery of nonfunctioning content and replace with functioning content	
	No O2 logo, no Payforit logo, or both [all screens]	2	Display both O2 and Payforit logos	
	Improper formatting of Payforit logo [all screens]	2	Consult Payforit Scheme Rules appendices for precise instructions on formatting and displaying Payforit logo, and reformat screen accordingly	
	Incorrect configuration for screen 175 pixels or below [all screens]	2	Configure screen layout as prescribed, in Payforit Scheme Rules, for screens 175 pixels or below	
	Incorrect configuration for screen between 176 and 239 pixels [all screens]	2	Configure screen layout as prescribed, in Payforit Scheme Rules, for screens between 176 and 239 pixels	
	Incorrect configuration for screen 240 pixels or above [all screens]	2	Configure screen layout as prescribed, in Payforit Scheme Rules, for screens 240 pixels or above	
	O2 logo displayed inconsistently [all screens]	2	Display O2 logo consistently on all payment screens	
	Displays merchant logo [all screens] R3.1.5	2	Remove merchant logos from all O2 payment and information screens	
	No or improperly formatted strap-line [all screens] B1.5	2	Format strap-line TRUSTED PAYMENTS BY PAYFORIT exactly as prescribed and display immediately below O2 and Payforit logos	
	*Failure to identify merchant [all payment screens] R3.3.8; R3.4	2	Display merchant or Website name (max 40 characters)	
	*Incorrect merchant [all payment screens] R3.3.8; R3.4	2	Display correct merchant or Website name (max 40 characters)	
	Unauthorised Payforit screen	2	Discontinue unauthorised Payforit screen immediately	
	Improper formatting of Payforit name [all screens]	2	Consult Payforit Scheme Rules appendices for precise instructions on formatting and displaying Payforit name and reformat accordingly	
	Pricing Notification Screens			
	Failure to format pricing notification screen according to Payforit Scheme Rules 3.3	2	Consult Payforit Scheme Rules for precise instructions on formatting pricing notification screen	
	Failure to format transaction type and description according to Payforit Scheme Rules R3.3.8	2	Consult Payforit Scheme Rules for precise wording and display transaction type and description exactly as prescribed	
	*No billing frequency [subscription] R3.3.8	2	Display billing frequency	
	*Conflicting billing frequency [subscription] R3.2.5	2	Reconcile, among ad, banners, and payment screens, references to billing frequency	
*No free period date [subscription] R3.2.6	2	Display free period date		
*Conflicting free period date [subscription] R3.2.6	2	Reconcile, among ad, banners, and pricing notification screen, references to free period date		
*No initial charge [subscription] R3.2.10	2	Display initial charge in prescribed format: £XX.XX		

*Indicates items in the transaction type and description.

O2 (WAP) Payforit Screen Audit Standards <i>continued</i>			
	Violations	Severity	Actions Required
Programme <i>continued</i>	Pricing Notification Screens <i>continued</i>		
	*Conflicting initial charge [subscription] R3.3.8	2	Reconcile, among ad, banners, and pricing notification screen, references to initial charge
	*No event disclosure [alerts subscription] R3.2.7	2	Disclose type of event
	No payment acceptance button R3.3.6.1	2	Implement PAY NOW, SUBSCRIBE NOW, or DONATE NOW button, as appropriate for transaction type
	Incorrect payment acceptance button R3.3.8	2	Display PAY NOW, SUBSCRIBE NOW, or DONATE NOW button, as appropriate for transaction type
	Nonfunctioning payment acceptance button R3.3.8	2	Implement PAY NOW, SUBSCRIBE NOW, or DONATE NOW button, as appropriate for transaction type
	No CANCEL button R3.3.7	2	Implement CANCEL button to discontinue purchase
	Nonfunctioning CANCEL button R3.3.7	2	Implement functioning CANCEL button
	No "What is Payforit?" link R3.3.4	2	Implement link to "What is Payforit?" screen with prescribed text according to Payforit Scheme Rules
	Nonfunctioning "What is Payforit?" link R3.3.4	2	Implement functioning link to "What is Payforit?" screen with prescribed text according to Payforit Scheme Rules
	No Terms & Conditions link R3.3.4	2	Implement link to Terms & Conditions screen with text, as appropriate
	Nonfunctioning Terms & Conditions link R3.3.4	2	Implement functioning link to Terms & Conditions screen with text, as appropriate
	No Operator Data Charges link R3.3.4	2	Implement link to Operator Data Charges disclosure
	Nonfunctioning Operator Data Charges link R3.3.4	2	Implement functioning link to Operator Data Charges disclosure
	No non-premium rate UK helpline number R3.3.5	2	Display non-premium rate UK helpline number
	Nonfunctioning or unresponsive non-premium rate UK helpline number R3.3.5	2	Implement functioning and responsive non-premium rate UK helpline and display number on all screens
	Payment Success Screens		
	No payment success screen ^β R3.3.6.2	2	Implement payment success screen according to Payforit Scheme Rules
	Failure to format payment success screen according to Payforit Scheme Rules 3.4	2	Consult Payforit Scheme Rules for precise instructions on formatting payment success screen
	No payment success confirmation ^ψ [first post-payment screen] R3.4.8.2	2	Advise user of payment success and payment amount on first post-payment screen
	Failure to format transaction type and description according to Payforit Scheme Rules R3.4.13.1	2	Consult Payforit Scheme Rules for precise wording and display transaction type and description exactly as prescribed
	*No shortcode (for opt-out information) [subscription] R3.4.13.1	2	Display shortcode
	Failure to format service delivery and preference confirmation message according to Payforit Scheme Rules R3.4.13.2	2	Consult Payforit Scheme Rules for precise wording and display service delivery and preference confirmation message exactly as prescribed
Failure to position service delivery and preference confirmation message according to Payforit Scheme Rules R3.4.13.2	2	Position service delivery and preference confirmation message so user is aware of marketing opt-in and Payforit Single Click checkboxes before proceeding to subsequent screens or service delivery	
No CONTINUE button 3.4	2	Implement CONTINUE button to enable customer to download content	
Nonfunctioning CONTINUE button 3.4	2	Implement functioning CONTINUE button to enable customer to download content	

*Indicates items in the transaction type and description.

^βCite only when payment success screen is required (not for option 4).

^ψCite only when no payment success screen is required.

O2 (WAP) Payfortit Screen Audit Standards <i>continued</i>			
	Violations	Severity	Actions Required
<i>Programme continued</i>	Payment Success Screens <i>continued</i>		
	Failure to format marketing opt-in message according to Payfortit Scheme Rules R3.4.9	2	Display marketing opt-in message in prescribed format: "Yes, I want free updates on similar products, services, and related special offers sent to my mobile [number] by [merchant]"
	Failure to format Payfortit Single Click message according to Payfortit Scheme Rules R3.4.10	2	Display Payfortit Single Click message in prescribed format: "Yes, I want to use Payfortit Single Click from now on with [merchant]."
	No "What is Payfortit Single Click"? link§ R3.4.5	2	Implement link to "What is Payfortit Single Click?" screen with prescribed text according to Payfortit Scheme Rules
	Nonfunctioning "What is Payfortit Single Click"? link§ R3.4.5	2	Implement functioning link to "What is Payfortit Single Click?" screen with prescribed text according to Payfortit Scheme Rules
	No "What is Payfortit?" link R3.4.6	2	Implement link to "What is Payfortit?" screen with prescribed text according to Payfortit Scheme Rules
	Nonfunctioning "What is Payfortit?" link R3.4.6	2	Implement functioning link to "What is Payfortit?" screen with prescribed text according to Payfortit Scheme Rules
	No Terms & Conditions link R3.4.6	2	Implement link to Terms & Conditions screen with text, as appropriate
	Nonfunctioning Terms & Conditions link R3.4.6	2	Implement functioning link to Terms & Conditions screen with text, as appropriate
	No Operator Data Charges link R3.4.6	2	Implement link to Operator Data Charges disclosure
	Nonfunctioning Operator Data Charges link R3.4.6	2	Implement functioning link to Operator Data Charges disclosure
	No redirect link and message R3.4	2	Implement redirect link with redirect message (e.g., "Redirecting to download your [content] now")
	No non-premium rate UK helpline number R3.4.7	2	Display non-premium rate UK helpline number
	Nonfunctioning or unresponsive non-premium rate UK helpline number R3.4.7	2	Implement functioning and responsive non-premium rate UK helpline and display number on all screens
	Payment Failure Screens		
	No payment failure screen 3.5	2	Implement payment failure screen according to Payfortit Scheme Rules
	Failure to format payment failure screen according to Payfortit Scheme Rules 3.5	2	Display failure reason, if possible, and implement "Continue to Shop" link
	Failure to format payment failure message according to Payfortit Scheme Rules R3.5.1	2	Display payment failure message in prescribed format: "Oops! There has been a problem with the transaction. You HAVE NOT been charged."
	No CONTINUE button R3.5.4	2	Implement CONTINUE button to enable customer to return to merchant site
	Nonfunctioning CONTINUE button R3.5.4	2	Implement functioning CONTINUE button
	No "What is Payfortit?" link 3.5	2	Implement link to "What is Payfortit?" screen with prescribed text according to Payfortit Scheme Rules
	Nonfunctioning "What is Payfortit?" link 3.5	2	Implement functioning link to "What is Payfortit?" screen with prescribed text according to Payfortit Scheme Rules
	No Terms & Conditions link R3.5	2	Implement link to Terms & Conditions screen with text, as appropriate
Nonfunctioning Terms & Conditions link R3.5	2	Implement functioning link to Terms & Conditions screen with text, as appropriate	
No Operator Data Charges link R3.5	2	Implement link to Operator Data Charges disclosure	
Nonfunctioning Operator Data Charges link R3.5	2	Implement functioning link to Operator Data Charges disclosure	

§Cite only when a Payfortit Single Click message and checkbox appears.

O2 (WAP) Payforit Screen Audit Standards <i>continued</i>			
	Violations	Severity	Actions Required
Programme <i>continued</i>	Payment Failure Screens <i>continued</i>		
	No non-premium rate UK helpline number R3.5.5	2	Display non-premium rate UK helpline number
	Nonfunctioning or unresponsive non-premium rate UK helpline number R3.5.5	2	Implement functioning and responsive non-premium rate UK helpline and display number on all screens
	Information Screens		
	Failure to format "What is Payforit Single Click?" screen text according to Payforit Scheme Rules R3.4.10	2	Consult Payforit Scheme Rules for precise instructions on wording and formatting of "What is Payforit Single Click?" screen text
	Failure to format "Want to know more?" screen text according to Payforit Scheme Rules R3.4.10	2	Consult Payforit Scheme Rules for precise instructions on wording and formatting of "Want to know more?" screen text
	Failure to format "What is Payforit?" screen text according to Payforit Scheme Rules R3.6.1	2	Consult Payforit Scheme Rules for precise instructions on wording and formatting of "What is Payforit?" screen text
	No BACK button on "What is Payforit Single Click?" screen	2	Implement BACK button on "What is Payforit Single Click?" screen linking to payment screen
	No BACK button on "Want to know more?" screen	2	Implement BACK button on "Want to know more?" screen linking to payment screen
	No BACK button on "What is Payforit?" screen R3.6.1	2	Implement BACK button on "What is Payforit?" screen linking to payment screen
	No BACK button on Terms & Conditions screen R3.6.3	2	Implement BACK button on Terms & Conditions screen linking to payment screen
	No BACK button on Operator Data Charges screen R3.6.2	2	Implement BACK button on Operator Data Charges screen linking to payment screen
	No non-premium rate UK helpline number R3.6.3.3	2	Display non-premium rate UK helpline number
Nonfunctioning or unresponsive non-premium rate UK helpline number R3.6.3.3	2	Implement functioning and responsive non-premium rate UK helpline and display number on all screens	
Pricing	*No pricing [all payment screens] R3.2.4; R3.3.8	2	Display full pricing clearly, including tax, in prescribed format: £XX.XX
	*Unclear pricing [all payment screens] R3.2.4	2	Display full and correct pricing clearly, including tax, in prescribed format: £XX.XX
	*Conflicting pricing [all payment screens] R3.2.4	2	Reconcile, among ad, banners, and payment screens, references to pricing
	*Failure to format pricing according to Payforit Scheme Rules [all payment screens] R3.2.4	2	Display pricing in prescribed format: £XX.XX
	*Use of the term <i>free</i> [all payment screens]	2	Remove the term <i>free</i>
T&Cs	Obscure or misleading Terms & Conditions	2	Clarify cost, subscription or one-off offer details, or both
	Trading company not identified R3.6.3.1	2	Display organisation trading name in Terms & Conditions
	Failure to display trading company registered address R3.6.3.2	2	Display trading company registered address in Terms & Conditions
Charges and Billing	Failure to format operator data charges disclosure according to Payforit Scheme Rules [data charges screen] R3.6.2	2	Display data charges disclosure in prescribed format: "You may be charged for data usage while browsing and downloading in accordance with your network's standard data tariffs, dependent on your data bundle/tariff."

*Indicates items in the transaction type and description.

O2 (Web) Payforit Screen Audit Standards			
	Violations	Severity	Actions Required
Programme	Failure to implement Payforit Scheme Rules v3.0 screen templates and requirements	2	Discontinue use of all previous Payforit Scheme Rules screen templates and requirements, and adopt v3.0 screen templates and requirements
	Failure to employ correct screen templates and requirements for Payforit Web purchases	2	Discontinue use of Payforit WAP screen templates and requirements for Web purchases, and implement Payforit Web screen templates and requirements for Web purchases Discontinue use of Payforit Web Lite screen templates and requirements for Web purchases, and implement Payforit Web screen templates and requirements for Web purchases
	*Misrepresentation of product or service offering 5.4.1a	2	Reconcile , among all banner, ad, and payment screens, references to product or service offering
	*Misrepresentation of product quantity 5.4.1a	2	Display only actual product quantity (e.g., 15 ringtones/mo.)
	*Unclear product quantity 5.4.1a	2	Reconcile, among all ad, banner, and payment screens, references to product quantity
	*No product or service disclosure [all payment screens] R5.8.2	2	Display clear statement allowing user to associate payment with product or service (max 40 characters)
	*Product or service unclear [all payment screens] R5.8.2	2	Display actual product or service name
	*Unauthorised product or service [all payment screens] 5.1.1; 6.1.1	2	Discontinue product or service until O2 authorises offer in writing
	Failure to deliver free content	2	Discontinue offer of free content
	Content nonfunctioning	2	Discontinue delivery of nonfunctioning content and replace with functioning content
	No operator logo, no Payforit logo, or both [all screens]	2	Display both operator and Payforit logos
	Improper operator logo or logos	2	Display only logo of customer's operator
	Improper formatting of Payforit logo [all screens]	2	Consult Payforit Scheme Rules appendices for precise instructions on formatting and displaying Payforit logo, and reformat screen accordingly
	Displays merchant logo [all screens] R3.1.5	2	Remove merchant logos from all payment screens
	No or improperly formatted strap-line [all screens] B1.5	2	Format strap-line TRUSTED PAYMENTS BY PAYFORIT exactly as prescribed and display immediately below O2 and Payforit logos
	*Failure to identify merchant [all payment screens] R5.8.1; R5.9.4	2	Display merchant or Website name (max 40 characters)
	*Incorrect merchant [all payment screens] R5.8.1; R5.9.4	2	Display correct merchant or Website name (max 40 characters)
	No X button in top right corner of screen [all screens] R5.2.1	2	Implement X button to enable customers to close Payforit screen and return to merchant Webpage
	Nonfunctional X button in top right corner of screen [all screens] R5.2.1	2	Implement functional X button to enable customers to close Payforit screen and return to merchant Webpage
	Unauthorised Payforit screen	2	Discontinue unauthorised Payforit screen immediately
Improper formatting of Payforit name [all screens]	2	Consult Payforit Scheme Rules appendices for precise instructions on formatting and displaying Payforit name and reformat accordingly	

*Indicates items in the transaction type and description (WHAT) field.

O2 (Web) Payforit Screen Audit Standards <i>continued</i>			
	Violations	Severity	Actions Required
Programme <i>continued</i>	Code-Receipt Screens (MO-originated only)		
	Failure to format code-receipt screen according to Payforit Scheme Rules 5.4	2	Consult Payforit Scheme Rules for precise instructions on formatting code-receipt screen
	Failure to format transaction type and description (WHAT) according to Payforit Scheme Rules 5.4	2	Consult Payforit Scheme Rules for precise wording and display transaction type and description exactly as prescribed
	*No billing frequency [subscription] 5.4	2	Display billing frequency
	*Conflicting billing frequency [subscription] 5.4	2	Reconcile, among ad, banners, and payment screens, references to billing frequency
	*No free period date [subscription] 5.4	2	Display free period date
	*Conflicting free period date [subscription] 5.4	2	Reconcile, among ad, banners, and pricing notification screen, references to free period date
	*No initial charge [subscription] 5.4	2	Display initial charge in prescribed format: £XX.XX
	*Conflicting initial charge [subscription] 5.4	2	Reconcile, among ad, banners, and pricing notification screen, references to initial charge
	*No event disclosure [alerts subscription] 5.4	2	Disclose type of event
	*No customer mobile number 5.4	2	Display customer mobile number
	Failure to display code R5.4.1	2	Display code generated for customer
	Failure to format opt-in message according to Payforit Scheme Rules 5.4	2	Display opt-in message as prescribed: "Text the above code to the number below and click the 'Text Sent' button."
	Failure to display shortcode R5.4.2	2	Display shortcode to which customer should text code
	Failure to format marketing opt-in message according to Payforit Scheme Rules 5.4	2	Display marketing opt-in message in prescribed format: "Yes, I want free updates on similar products, services, and related special offers sent to my mobile [number] by [merchant]"
	No TEXT SENT button 5.4	2	Implement TEXT SENT button
	Nonfunctioning TEXT SENT button 5.4	2	Implement functioning TEXT SENT button
	*No merchant / link (WHAT) 5.4	2	Implement / link to screen with information regarding merchant
	*Nonfunctioning merchant / link (WHAT) 5.4	2	Implement functioning / link to screen with information regarding merchant
	No "What is Payforit" link 5.4	2	Implement link to "What is Payforit" screen with prescribed text according to Payforit Scheme Rules
	Nonfunctioning "What is Payforit" link 5.4	2	Implement functioning link to "What is Payforit" screen with prescribed text according to Payforit Scheme Rules
	No Terms & Conditions link 5.4	2	Implement link to Terms & Conditions screen with text, as appropriate, including mandated operator data charges disclosure
	Nonfunctioning Terms & Conditions link 5.4	2	Implement functioning link to Terms & Conditions screen with text, as appropriate, including mandated operator data charges disclosure
No Security Info link 5.4	2	Implement link to Security Info screen with prescribed text according to Payforit Scheme Rules	
Nonfunctioning Security Info link 5.4	2	Implement functioning link to Security Info screen with prescribed text according to Payforit Scheme Rules	
No Privacy Notice link 5.4	2	Implement link to Privacy Notice screen with prescribed text according to Payforit Scheme Rules	
Nonfunctioning Privacy Notice link 5.4	2	Implement functioning link to Privacy Notice screen with prescribed text according to Payforit Scheme Rules	

*Indicates items in the transaction type and description (WHAT) field.

O2 (Web) Payforit Screen Audit Standards <i>continued</i>			
	Violations	Severity	Actions Required
Programme <i>continued</i>	Pending Screens (MO-originated only)		
	Failure to format pending screen according to Payforit Scheme Rules 5.4	2	Consult Payforit Scheme Rules for precise instructions on formatting pending screen
	Failure to format transaction type and description (WHAT) according to Payforit Scheme Rules 5.4	2	Consult Payforit Scheme Rules for precise wording and display transaction type and description exactly as prescribed
	*No billing frequency [subscription] 5.4	2	Display billing frequency
	*Conflicting billing frequency [subscription] 5.4	2	Reconcile, among ad, banners, and payment screens, references to billing frequency
	*No free period date [subscription] 5.4	2	Display free period date
	*Conflicting free period date [subscription] 5.4	2	Reconcile, among ad, banners, and pricing notification screen, references to free period date
	*No initial charge [subscription] 5.4	2	Display initial charge in prescribed format: £XX.XX
	*Conflicting initial charge [subscription] 5.4	2	Reconcile, among ad, banners, and pricing notification screen, references to initial charge
	*No event disclosure [alerts subscription] 5.4	2	Disclose type of event
	*No customer mobile number 5.4	2	Display customer mobile number
	Failure to format pending message according to Payforit Scheme Rules 5.4	2	Display pending message as prescribed: "We are waiting to receive your text."
	*No merchant / link (WHAT) 5.4	2	Implement / link to screen with information regarding merchant
	*Nonfunctioning merchant / link (WHAT) 5.4	2	Implement functioning / link to screen with information regarding merchant
	No "What is Payforit" link 5.4	2	Implement link to "What is Payforit" screen with prescribed text according to Payforit Scheme Rules
	Nonfunctioning "What is Payforit" link 5.4	2	Implement functioning link to "What is Payforit" screen with prescribed text according to Payforit Scheme Rules
	No Terms & Conditions link 5.4	2	Implement link to Terms & Conditions screen with text, as appropriate, including mandated operator data charges disclosure
	Nonfunctioning Terms & Conditions link 5.4	2	Implement functioning link to Terms & Conditions screen with text, as appropriate, including mandated operator data charges disclosure
	No Security Info link 5.4	2	Implement link to Security Info screen with prescribed text according to Payforit Scheme Rules
	Nonfunctioning Security Info link 5.4	2	Implement functioning link to Security Info screen with prescribed text according to Payforit Scheme Rules
No Privacy Notice link 5.4	2	Implement link to Privacy Notice screen with prescribed text according to Payforit Scheme Rules	
Nonfunctioning Privacy Notice link 5.4	2	Implement functioning link to Privacy Notice screen with prescribed text according to Payforit Scheme Rules	

*Indicates items in the transaction type and description (WHAT) field.

O2 (Web) Payforit Screen Audit Standards <i>continued</i>			
	Violations	Severity	Actions Required
Programme <i>continued</i>	MSISDN-Capture Screens (MT-originated only)		
	Failure to format payment MSISDN-capture screen according to Payforit Scheme Rules 5.3	2	Consult Payforit Scheme Rules for precise instructions on formatting payment MSISDN-capture screen
	Failure to format transaction type and description (WHAT) according to Payforit Scheme Rules R5.9.4	2	Consult Payforit Scheme Rules for precise wording and display transaction type and description exactly as prescribed
	*No billing frequency [subscription] R5.8.5; R5.9.4	2	Display billing frequency
	*No free period date [subscription] R5.8.6; R5.9.4	2	Display free period date
	*Conflicting billing frequency [subscription] R5.8.5; R5.9.4	2	Reconcile, among ad, banners, and payment screens, references to billing frequency
	*Conflicting free period date [subscription] R5.8.6; R5.9.4	2	Reconcile, among ad, banners, and pricing notification screen, references to free period date
	*No initial charge [subscription] R5.9.4	2	Display initial charge in prescribed format: £XX.XX
	*Conflicting initial charge [subscription] R5.9.4	2	Reconcile, among ad, banners, and pricing notification screen, references to initial charge
	*No event disclosure [alerts subscription] R5.8.7; R5.9.4	2	Disclose type of event
	Nonfunctioning operator capture box R5.3.4.1	2	Implement functioning operator capture box
	Failure to format mobile broadband account help message according to Payforit Scheme Rules R5.3.5	2	Display mobile broadband account help text in prescribed format: "If you want to pay on your mobile broadband account, click here "
	No SEND ME MY CODE button R5.3	2	Implement SEND ME MY CODE button
	Nonfunctioning SEND ME MY CODE button R5.3	2	Implement functioning SEND ME MY CODE button
	*No merchant <i>i</i> link (WHAT) R5.2.3.1	2	Implement <i>i</i> link to screen with information regarding merchant
	*Nonfunctioning merchant <i>i</i> link (WHAT) R5.2.3.1	2	Implement functioning <i>i</i> link to screen with information regarding merchant
	Nonfunctioning mobile broadband account help link R5.3.5	2	Implement functioning link to screen with mobile broadband account help
	No "What is Payforit" link R5.2.3.2	2	Implement link to "What is Payforit" screen with prescribed text according to Payforit Scheme Rules
	Nonfunctioning "What is Payforit" link R5.2.3.2	2	Implement functioning link to "What is Payforit" screen with prescribed text according to Payforit Scheme Rules
	No Terms & Conditions link R5.2.3.2	2	Implement link to Terms & Conditions screen with text, as appropriate, including mandated operator data charges disclosure
Nonfunctioning Terms & Conditions link R5.2.3.2	2	Implement functioning link to Terms & Conditions screen with text, as appropriate, including mandated operator data charges disclosure	
No Security Info link R5.2.3.2	2	Implement link to Security Info screen with prescribed text according to Payforit Scheme Rules	
Nonfunctioning Security Info link R5.2.3.2	2	Implement functioning link to Security Info screen with prescribed text according to Payforit Scheme Rules	
No Privacy Notice link R5.2.3.2	2	Implement link to Privacy Notice screen with prescribed text according to Payforit Scheme Rules	
Nonfunctioning Privacy Notice link R5.2.3.2	2	Implement functioning link to Privacy Notice screen with prescribed text according to Payforit Scheme Rules	

*Indicates items in the transaction type and description (WHAT) field.

O2 (Web) Payforit Screen Audit Standards <i>continued</i>			
	Violations	Severity	Actions Required
Programme <i>continued</i>	Code-Receipt Screens (MT-originated only)		
	Failure to format code-receipt screen according to Payforit Scheme Rules 5.3	2	Consult Payforit Scheme Rules for precise instructions on formatting code-receipt screen
	Failure to format transaction type and description (WHAT) according to Payforit Scheme Rules R5.9.4	2	Consult Payforit Scheme Rules for precise wording and display transaction type and description exactly as prescribed
	*No billing frequency [subscription] R5.8.5; R5.9.4	2	Display billing frequency
	*Conflicting billing frequency [subscription] R5.8.5; R5.9.4	2	Reconcile, among ad, banners, and payment screens, references to billing frequency
	*No free period date [subscription] R5.8.6; R5.9.4	2	Display free period date
	*Conflicting free period date [subscription] R5.8.6; R5.9.4	2	Reconcile, among ad, banners, and pricing notification screen, references to free period date
	*No initial charge [subscription] R5.9.4	2	Display initial charge in prescribed format: £XX.XX
	*Conflicting initial charge [subscription] R5.9.4	2	Reconcile, among ad, banners, and pricing notification screen, references to initial charge
	*No event disclosure [alerts subscription] R5.8.7; R5.9.4	2	Disclose type of event
	*No operator name R5.9.2	2	Display operator name
	*No customer mobile number R5.9.2	2	Display customer mobile number
	No I'VE RECEIVED MY CODE button R5.3	2	Implement I'VE RECEIVED MY CODE button
	Nonfunctioning I'VE RECEIVED MY CODE button	2	Implement functioning I'VE RECEIVED MY CODE button
	No CODE NOT RECEIVED button R5.3	2	Implement CODE NOT RECEIVED button
	Nonfunctioning CODE NOT RECEIVED button R5.3	2	Implement functioning CODE NOT RECEIVED button
	*No merchant <i>i</i> link (WHAT) R5.2.3.1	2	Implement <i>i</i> link to screen with information regarding merchant
	*Nonfunctioning merchant <i>i</i> link (WHAT) R5.2.3.1	2	Implement functioning <i>i</i> link to screen with information regarding merchant
	No "What is Payforit" link R5.2.3.2	2	Implement link to "What is Payforit" screen with prescribed text according to Payforit Scheme Rules
	Nonfunctioning "What is Payforit" link R5.2.3.2	2	Implement functioning link to "What is Payforit" screen with prescribed text according to Payforit Scheme Rules
No Terms & Conditions link R5.2.3.2	2	Implement link to Terms & Conditions screen with text, as appropriate, including mandated operator data charges disclosure	
Nonfunctioning Terms & Conditions link R5.2.3.2	2	Implement functioning link to Terms & Conditions screen with text, as appropriate, including mandated operator data charges disclosure	
No Security Info link R5.2.3.2	2	Implement link to Security Info screen with prescribed text according to Payforit Scheme Rules	
Nonfunctioning Security Info link R5.2.3.2	2	Implement functioning link to Security Info screen with prescribed text according to Payforit Scheme Rules	
No Privacy Notice link R5.2.3.2	2	Implement link to Privacy Notice screen with prescribed text according to Payforit Scheme Rules	
Nonfunctioning Privacy Notice link R5.2.3.2	2	Implement functioning link to Privacy Notice screen with prescribed text according to Payforit Scheme Rules	

*Indicates items in the transaction type and description (WHAT) field.

O2 (Web) Payforit Screen Audit Standards <i>continued</i>			
	Violations	Severity	Actions Required
Programme <i>continued</i>	Code-Entry Screens (MT-originated only)		
	Failure to format code-entry screen according to Payforit Scheme Rules 5.3	2	Consult Payforit Scheme Rules for precise instructions on formatting code-entry screen
	Failure to format transaction type and description (WHAT) according to Payforit Scheme Rules R5.9.4	2	Consult Payforit Scheme Rules for precise wording and display transaction type and description exactly as prescribed
	*No billing frequency [subscription] R5.8.5; R5.9.4	2	Display billing frequency
	*Conflicting billing frequency [subscription] R5.8.5; R5.9.4	2	Reconcile, among ad, banners, and payment screens, references to billing frequency
	*No free period date [subscription] R5.8.6; R5.9.4	2	Display free period date
	*Conflicting free period date [subscription] R5.8.6; R5.9.4	2	Reconcile, among ad, banners, and pricing notification screen, references to free period date
	*No initial charge [subscription] R5.9.4	2	Display initial charge in prescribed format: £XX.XX
	*Conflicting initial charge [subscription] R5.9.4	2	Reconcile, among ad, banners, and pricing notification screen, references to initial charge
	*No event disclosure [alerts subscription] R5.8.7; R5.9.4	2	Disclose type of event
	*No operator name R5.9.2	2	Display operator name
	*No customer mobile number R5.9.2	2	Display customer mobile number
	Failure to format marketing opt-in message according to Payforit Scheme Rules R5.3.1.2	2	Display marketing opt-in message in prescribed format: "Yes, I want free updates on similar products, services, and related special offers sent to my mobile [number] by [merchant]"
	No PAY NOW button R5.3	2	Implement PAY NOW button
	Nonfunctioning PAY NOW button R5.3	2	Implement functioning PAY NOW button
	No CODE NOT RECEIVED button R5.3	2	Implement CODE NOT RECEIVED button
	Nonfunctioning CODE NOT RECEIVED button R5.3	2	Implement functioning CODE NOT RECEIVED button
	*No merchant / link (WHAT) R5.2.3.1	2	Implement / link to screen with information regarding merchant
	*Nonfunctioning merchant / link (WHAT) R5.2.3.1	2	Implement functioning / link to screen with information regarding merchant
	No "What is Payforit" link R5.2.3.2	2	Implement link to "What is Payforit" screen with prescribed text according to Payforit Scheme Rules
	Nonfunctioning "What is Payforit" link R5.2.3.2	2	Implement functioning link to "What is Payforit" screen with prescribed text according to Payforit Scheme Rules
	No Terms & Conditions link R5.2.3.2	2	Implement link to Terms & Conditions screen with text, as appropriate, including mandated operator data charges disclosure
	Nonfunctioning Terms & Conditions link R5.2.3.2	2	Implement functioning link to Terms & Conditions screen with text, as appropriate, including mandated operator data charges disclosure
No Security Info link R5.2.3.2	2	Implement link to Security Info screen with prescribed text according to Payforit Scheme Rules	
Nonfunctioning Security Info link R5.2.3.2	2	Implement functioning link to Security Info screen with prescribed text according to Payforit Scheme Rules	
No Privacy Notice link R5.2.3.2	2	Implement link to Privacy Notice screen with prescribed text according to Payforit Scheme Rules	
Nonfunctioning Privacy Notice link R5.2.3.2	2	Implement functioning link to Privacy Notice screen with prescribed text according to Payforit Scheme Rules	

*Indicates items in the transaction type and description (WHAT) field.

O2 (Web) Payforit Screen Audit Standards <i>continued</i>			
	Violations	Severity	Actions Required
Programme <i>continued</i>	Payment Success Screens		
	Failure to format payment success screen according to Payforit Scheme Rules 5.3	2	Consult Payforit Scheme Rules for precise instructions on formatting payment success screen
	Failure to format transaction type and description (WHAT) according to Payforit Scheme Rules R5.9.4	2	Consult Payforit Scheme Rules for precise wording and display transaction type and description exactly as prescribed
	*No billing frequency [subscription] R5.8.5; R5.9.4	2	Display billing frequency
	*Conflicting billing frequency [subscription] R5.8.5; R5.9.4	2	Reconcile, among ad, banners, and payment screens, references to billing frequency
	*No free period date [subscription] R5.8.6; R5.9.4	2	Display free period date
	*Conflicting free period date [subscription] R5.8.6; R5.9.4	2	Reconcile, among ad, banners, and pricing notification screen, references to free period date
	*No initial charge [subscription] R5.9.4	2	Display initial charge in prescribed format: £XX.XX
	*Conflicting initial charge [subscription] R5.9.4	2	Reconcile, among ad, banners, and pricing notification screen, references to initial charge
	*No event disclosure [alerts subscription] R5.8.7; R5.9.4	2	Disclose type of event
	*No operator name R5.9.2	2	Display operator name
	*No customer mobile number R5.9.2	2	Display customer mobile number
	No receipt option link or links R5.3.16	2	Implement link or links to receipt screen or screens, as appropriate, with prescribed text according to Payforit Scheme Rules
	Nonfunctioning receipt option link or links R5.3.16	2	Implement functioning link or links to receipt screen or screens, as appropriate, with prescribed text according to Payforit Scheme Rules
	No text message receipt confirmation message R5.3.16.1	2	Display text message receipt confirmation on subscription success screen in prescribed format: "A receipt is being sent to your mobile."
	No email address entry screen for email receipt R5.3.16.2	2	Implement email address entry screen for email receipt
	Nonfunctioning email address entry screen for email receipt R5.3.16.2	2	Implement functioning email address entry screen for email receipt
	No print receipt screen R5.3.16.3	2	Implement print receipt screen for printed receipt
	Nonfunctioning print receipt screen R5.3.16.3	2	Implement functioning print receipt screen for printed receipt
	No CONTINUE button R5.3	2	Implement CONTINUE button
	Nonfunctioning CONTINUE button R5.3	2	Implement functioning CONTINUE button
	*No merchant <i>i</i> link (WHAT) R5.2.3.1	2	Implement <i>i</i> link to screen with information regarding merchant
	*Nonfunctioning merchant <i>i</i> link (WHAT) R5.2.3.1	2	Implement functioning <i>i</i> link to screen with information regarding merchant
	No "What is Payforit" link R5.2.3.2	2	Implement link to "What is Payforit" screen with prescribed text according to Payforit Scheme Rules
	Nonfunctioning "What is Payforit" link R5.2.3.2	2	Implement functioning link to "What is Payforit" screen with prescribed text according to Payforit Scheme Rules
	No Terms & Conditions link R5.2.3.2	2	Implement link to Terms & Conditions screen with text, as appropriate, including mandated operator data charges disclosure
	Nonfunctioning Terms & Conditions link R5.2.3.2	2	Implement functioning link to Terms & Conditions screen with text, as appropriate, including mandated operator data charges disclosure

*Indicates items in the transaction type and description (WHAT) field.

O2 (Web) Payforit Screen Audit Standards <i>continued</i>			
	Violations	Severity	Actions Required
Programme <i>continued</i>	Payment Success Screens <i>continued</i>		
	No Security Info link R5.2.3.2	2	Implement link to Security Info screen with prescribed text according to Payforit Scheme Rules
	Nonfunctioning Security Info link R5.2.3.2	2	Implement functioning link to Security Info screen with prescribed text according to Payforit Scheme Rules
	No Privacy Notice link R5.2.3.2	2	Implement link to Privacy Notice screen with prescribed text according to Payforit Scheme Rules
	Nonfunctioning Privacy Notice link R5.2.3.2	2	Implement functioning link to Privacy Notice screen with prescribed text according to Payforit Scheme Rules
	Payment Failure Screens		
	Failure to format payment failure screen according to Payforit Scheme Rules 5.4.7	2	Consult Payforit Scheme Rules for precise instructions on formatting payment failure screen
	Failure to format transaction type and description (WHAT) according to Payforit Scheme Rules R5.9.4	2	Consult Payforit Scheme Rules for precise wording and display transaction type and description exactly as prescribed
	Failure to format ERROR message according to Payforit Scheme Rules 5.4.7	2	Display ERROR message in prescribed format: “OOPS! Something went wrong. Sorry. There has been a problem with the transaction. You have NOT been charged. Click ‘Back’ to retry your purchase.”
	*No billing frequency [subscription] R5.8.5; R5.9.4	2	Display billing frequency
	*Conflicting billing frequency [subscription] R5.8.5; R5.9.4	2	Reconcile, among ad, banners, and payment screens, references to billing frequency
	*No free period date [subscription] R5.8.6; R5.9.4	2	Display free period date
	*Conflicting free period date [subscription] R5.8.6; R5.9.4	2	Reconcile, among ad, banners, and pricing notification screen, references to free period date
	*No initial charge [subscription] R5.9.4	2	Display initial charge in prescribed format: £XX.XX
	*Conflicting initial charge [subscription] R5.9.4	2	Reconcile, among ad, banners, and pricing notification screen, references to initial charge
	*No event disclosure [alerts subscription] R5.8.7; R5.9.4	2	Disclose type of event
	*No operator name R5.9.2	2	Display operator name
	*No customer mobile number R5.9.2	2	Display customer mobile number
	No BACK button R5.3.23	2	Implement BACK button on payment failure screen linking to merchant Webpage
	Nonfunctioning BACK button R5.3.23	2	Implement functioning BACK button on payment failure screen linking to merchant Webpage
	*No merchant / link (WHAT) R5.2.3.1	2	Implement / link to screen with information regarding merchant
	*Nonfunctioning merchant / link (WHAT) R5.2.3.1	2	Implement functioning / link to screen with information regarding merchant
	No “What is Payforit” link R5.2.3.2	2	Implement link to “What is Payforit” screen with prescribed text according to Payforit Scheme Rules
Nonfunctioning “What is Payforit” link R5.2.3.2	2	Implement functioning link to “What is Payforit” screen with prescribed text according to Payforit Scheme Rules	
No Terms & Conditions link R5.2.3.2	2	Implement link to Terms & Conditions screen with text, as appropriate, including mandated operator data charges disclosure	
Nonfunctioning Terms & Conditions link R5.2.3.2	2	Implement functioning link to Terms & Conditions screen with text, as appropriate, including mandated operator data charges disclosure	

*Indicates items in the transaction type and description (WHAT) field.

O2 (Web) Payforit Screen Audit Standards <i>continued</i>			
	Violations	Severity	Actions Required
Programme <i>continued</i>	Payment Failure Screens <i>continued</i>		
	No Security Info link R5.2.3.2	2	Implement link to Security Info screen with prescribed text according to Payforit Scheme Rules
	Nonfunctioning Security Info link R5.2.3.2	2	Implement functioning link to Security Info screen with prescribed text according to Payforit Scheme Rules
	No Privacy Notice link R5.2.3.2	2	Implement link to Privacy Notice screen with prescribed text according to Payforit Scheme Rules
	Nonfunctioning Privacy Notice link R5.2.3.2	2	Implement functioning link to Privacy Notice screen with prescribed text according to Payforit Scheme Rules
	Information Screens		
	Failure to format mobile broadband account help screen text according to Payforit Scheme Rules R5.3.5	2	Consult Payforit Scheme Rules for precise instructions on wording and formatting of mobile broadband account help screen text
	Failure to format "What is Payforit?" screen text according to Payforit Scheme Rules R5.7.2	2	Consult Payforit Scheme Rules for precise instructions on wording and formatting of "What is Payforit?" screen text
	Failure to format Security Info screen text according to Payforit Scheme Rules R5.7.4	2	Consult Payforit Scheme Rules for precise instructions on wording and formatting of Security Info screen text
	Failure to format Privacy Notice screen text according to Payforit Scheme Rules R5.7.5	2	Consult Payforit Scheme Rules for precise instructions on wording and formatting of Privacy Notice screen text
	No CONTINUE button [mobile broadband account help screen] R5.3.5	2	Implement CONTINUE button to enable customers to proceed with purchase
	No CANCEL button [mobile broadband account help screen] R5.3.5	2	Implement CANCEL button to enable customers to return to payment MSISDN-submit screen
	Nonfunctioning scroll-box on "What is Payforit" screen R5.7.6	2	Implement functioning scroll-box on "What is Payforit" screen so customers can access entire text
	Nonfunctioning scroll-box on Privacy Notice screen R5.7.6	2	Implement functioning scroll-box on Privacy Notice screen so customers can access entire text
	Nonfunctioning scroll-box on Terms & Conditions screen R5.7.6	2	Implement functioning scroll-box on Terms & Conditions screen so customers can access entire text
	No BACK button on "What is Payforit?" screen R5.7.7	2	Implement BACK button on "What is Payforit?" screen linking to payment screen
	Nonfunctioning BACK button on "What is Payforit?" screen R5.7.7	2	Implement functioning BACK button on "What is Payforit?" screen linking to payment screen
	No BACK button on Terms & Conditions screen R5.7.7	2	Implement BACK button on Terms & Conditions screen linking to payment screen
	Nonfunctioning BACK button on Terms & Conditions screen R5.7.7	2	Implement functioning BACK button on Terms & Conditions screen linking to payment screen
	No BACK button on Security Info screen R5.7.7	2	Implement BACK button on Security Info screen linking to payment screen
	Nonfunctioning BACK button on Security Info screen R5.7.7	2	Implement functioning BACK button on Security Info screen linking to payment screen
	No BACK button on Privacy Notice screen R5.7.7	2	Implement BACK button on Privacy Notice screen linking to payment screen
	Nonfunctioning BACK button on Privacy Notice screen R5.7.7	2	Implement nonfunctioning BACK button on Privacy Notice screen linking to payment screen
No "What is Payforit" link R5.2.3.2	2	Implement link to "What is Payforit" screen with prescribed text according to Payforit Scheme Rules	
Nonfunctioning "What is Payforit" link R5.2.3.2	2	Implement functioning link to "What is Payforit" screen with prescribed text according to Payforit Scheme Rules	

O2 (Web) Payforit Screen Audit Standards <i>continued</i>			
	Violations	Severity	Actions Required
Programme <i>continued</i>	Information Screens <i>continued</i>		
	No Terms & Conditions link R5.2.3.2	2	Implement link to Terms & Conditions screen with text, as appropriate, including mandated operator data charges disclosure
	Nonfunctioning Terms & Conditions link R5.2.3.2	2	Implement functioning link to Terms & Conditions screen with text, as appropriate, including mandated operator data charges disclosure
	No Security Info link R5.2.3.2	2	Implement link to Security Info screen with prescribed text according to Payforit Scheme Rules
	Nonfunctioning Security Info link R5.2.3.2	2	Implement functioning link to Security Info screen with prescribed text according to Payforit Scheme Rules
	No Privacy Notice link R5.2.3.2	2	Implement link to Privacy Notice screen with prescribed text according to Payforit Scheme Rules
	Nonfunctioning Privacy Notice link R5.2.3.2	2	Implement functioning link to Privacy Notice screen with prescribed text according to Payforit Scheme Rules
Pricing	*No pricing [all payment screens] R5.8.4 ; R5.9.4	2	Display full pricing clearly, including tax, in prescribed format: £XX.XX
	*Unclear pricing [all payment screens] R5.8.4	2	Display full and correct pricing clearly, including tax, in prescribed format: £XX.XX
	*Conflicting pricing [all payment screens] R5.8.4	2	Reconcile, among ad, banners, and payment screens, references to pricing
	*Failure to format pricing according to Payforit Scheme Rules [all payment screens] R5.8.4	2	Display pricing in prescribed format: £XX.XX
	*Use of the term <i>free</i> [all payment screens]	2	Remove the term <i>free</i>
T&Cs	Obscure or misleading Terms & Conditions	2	Clarify cost, subscription or one-off offer details, or both
	Trading company not identified R5.7.3	2	Display organisation trading name in Terms & Conditions
	Failure to display trading company registered address R5.7.3	2	Display trading company registered address in Terms & Conditions
	No non-premium rate UK helpline number R5.7.3	2	Display non-premium rate UK helpline number in Terms & Conditions
	Failure to format operator data charges disclosure according to Payforit Scheme Rules [Terms & Conditions screen] R5.7.3	2	Display data charges disclosure in prescribed format: "You may be charged for data usage while browsing and downloading in accordance with your network's standard data tariffs, dependent on your data bundle/tariff."

*Indicates items in the transaction type and description (WHAT) field.

O2 Payforit Message Flow Audit Standards					
		Violations	Severity	Actions Required	
All Msgs	Programme	Improper formatting of Payforit name A1.6	2	Consult Payforit Scheme Rules appendices for precise instructions on formatting and displaying Payforit name and reformat accordingly	
	T&Cs	No non-premium rate UK helpline number	2	Display non-premium rate UK helpline number	
		Nonfunctioning or unresponsive non-premium rate UK helpline number	2	Implement functioning and responsive non-premium rate UK helpline and display number on all screens	
Payment Code	One-Off and Subscription	Failure to send payment code text message R5.3.3	2	Send message: "Your unique payment code is [code]. Please enter this code on the Payforit Web page now to complete payment."	
		Failure to format payment code text message according to Payforit Scheme Rules R5.3.3	2	Format message as: "Your unique payment code is [code]. Please enter this code on the Payforit Web page now to complete payment."	
		Multiple payment code text messages R5.3.3	2	Refrain from sending more than one payment code text message per customer request	
		Failure to preface payment code text message with "FreeMsg" R5.3.3	2	Preface payment code text message with "FreeMsg"	
Payment Receipt*	One-Off and Subscription	Failure to send payment receipt text message R5.3.16	2	Send message: "Thank you. You have been charged [£XX.XX] for [content] from [merchant]. Help: [non-premium rate UK number]"	
		Failure to format payment receipt text message according to Payforit Scheme Rules R5.3.16.1	2	Format message as: "Thank you. You have been charged [£XX.XX] for [content] from [merchant]. Help: [non-premium rate UK number]" (include URL leading back to content or merchant Website, if possible)	
		Failure to preface payment receipt text message with "FreeMsg" R5.3.16.1	2	Preface payment receipt text message with "FreeMsg"	
Payment Success (WAP only)	One-Off	Failure to send payment success text message R3.4.8.2	2	Send message: "Thank you. You have been charged [£XX.XX] for [content] from [merchant]. Help: [non-premium rate UK number]"	
		Failure to format payment success text message according to Payforit Scheme Rules R3.4.8.2	2	Format message as: "Thank you. You have been charged [£XX.XX] for [content] from [merchant]. Help: [non-premium rate UK number]." (include URL leading back to content or merchant Website, if possible)	
		Product or service unclear R3.2.3	2	Display actual product or service name	
	Subscription	Failure to send payment success text message 4.1		2	Send message: "U are subscribed to [content package] for [£XX.XX] per [billing frequency] until you send STOP to [shortcode]. Help: [non-premium rate UK number]"
				2	Send message: "U will be subscribed to [content package] for [£XX.XX] per [billing frequency] from [date free period ends] unless you send STOP to [shortcode].Help: [non-premium rate UK number]"
				2	Send message: "U are subscribed to [content package] for [initial charge] plus [£XX.XX] per [billing frequency] until you send STOP to [shortcode].Help: [non-premium rate UK number]"
				2	Send message: "U are subscribed to [content package] for [£XX.XX] per [event] until you send STOP to [shortcode]. Help: [non-premium rate UK number]"

				Send message: "U are subscribed to [content package] for [£XX.XX] per [event] from [date free period ends] until you send STOP to [shortcode]. Help: [non-premium rate UK number]"
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*Web only.

§Cite only when no payment success screen is required.

O2 Payforit Message Flow Audit Standards <i>continued</i>				
		Violations	Severity	Actions Required
Payment Success (WAP only)	Subscription <i>continued</i>	Failure to format payment success text message according to Payforit Scheme Rules 4.1	2	Format message as: "U are subscribed to [content package] for [price in £] per [billing frequency] until you send STOP to [shortcode]. Help: [non-premium rate UK number]"
				Format message as: "U will be subscribed to [content package] for [price in £] per [billing frequency] from [date free period ends] unless you send STOP to [shortcode].Help: [non-premium rate UK number]"
				Format message as: "U are subscribed to [content package] for [initial charge] plus [price in £] per [billing frequency] until you send STOP to [shortcode].Help: [non-premium rate UK number]"
				Format message as: "U are subscribed to [content package] for [price in £] per [event] until you send STOP to [shortcode]. Help: [non-premium rate UK number]"
				Format message as: "U are subscribed to [content package] for [price in £] per [event] from [date free period ends] until you send STOP to [shortcode]. Help: [non-premium rate UK number]"
		Product or service unclear R3.2.3	2	Display actual product or service name
Marketing	Programme	Unauthorised marketing message or messages 2.4.1; Privacy and Consent to Charge Guidance Note	1	Refrain from sending marketing messages to customers who decline option or opt out
	Pricing	Inappropriate use of the term <i>free</i> 2.3.2	2	Discontinue use of the term <i>free</i>
	T&Cs	No instructions for opting out of marketing messages R3.4.9.3	2	Display instructions for opting out of marketing messages as "Reply" STOP or "Text" STOP to [shortcode]

Section 7 – Age Verification

O2 Age Verification Audit Standards

O2 Age Verification Audit Standards			
	Violations	Severity	Actions Required
Adult	Adult services operating on unapproved shortcode (i.e., 69, 79, or 89)	1	Discontinue adult services operating on unapproved shortcode immediately
	Billed services featuring adult themes (e.g., alcohol) accessible using non-age verified handset	1	Block access immediately, for non-age verified handsets, to billed services featuring adult themes (e.g., alcohol)
	Unbilled services featuring adult themes (e.g., alcohol) accessible using non-age verified handset	2	Block access immediately, for non-age verified handsets, to unbilled services featuring adult themes (e.g., alcohol)
	Thumbnails featuring adult themes (e.g., alcohol) accessible using non-age verified handset	2	Block access immediately, for non-age verified handsets, to thumbnails featuring adult themes (e.g., alcohol)
	Billed services featuring frequent, repetitive use of strong foul language accessible using non-age verified handset	1	Block access immediately, for non-age verified handsets, to billed services featuring frequent, repetitive use of strong foul language
	Unbilled services featuring frequent, repetitive use of strong foul language accessible using non-age verified handset	2	Block access immediately, for non-age verified handsets, to unbilled services featuring frequent, repetitive use of strong foul language
	Billed services featuring actual or realistic depictions of sexual activity accessible using non-age verified handset§	1	Block access immediately, for non-age verified handsets, to billed services featuring actual or realistic depictions of sexual activity
	Unbilled services featuring actual or realistic depictions of sexual activity accessible using non-age verified handset§	1	Block access immediately, for non-age verified handsets, to unbilled services featuring actual or realistic depictions of sexual activity
	Thumbnails featuring actual or realistic depictions of sexual activity accessible using non-age verified handset§	1	Block access immediately, for non-age verified handsets, to thumbnails featuring actual or realistic depictions of sexual activity
	Billed services featuring nudity accessible using non-age verified handset€	1	Block access immediately, for non-age verified handsets, to billed services featuring nudity
	Unbilled services featuring nudity accessible using non-age verified handset€	1	Block access immediately, for non-age verified handsets, to unbilled services featuring nudity
	Thumbnails featuring nudity accessible using non-age verified handset€	1	Block access immediately, for non-age verified handsets, to thumbnails featuring nudity
	Billed services featuring depictions of graphic violence accessible using non-age verified handsetβ	1	Block access immediately, for non-age verified handsets, to billed services featuring depictions of graphic violence
	Unbilled services featuring depictions of graphic violence accessible using non-age verified handsetβ	2	Block access immediately, for non-age verified handsets, to unbilled services featuring depictions of graphic violence
	Thumbnails featuring depictions of graphic violence accessible using non-age verified handsetβ	2	Block access immediately, for non-age verified handsets, to thumbnails featuring depictions of graphic violence
	Billed services featuring depictions of illicit drugs or drug-taking accessible using non-age verified handset¥	1	Block access immediately, for non-age verified handsets, to billed services featuring depictions of illicit drugs or drug-taking
	Unbilled services featuring depictions of illicit drugs or drug-taking accessible using non-age verified handset¥	2	Block access immediately, for non-age verified handsets, to unbilled services featuring depictions of illicit drugs or drug-taking
Thumbnails featuring depictions of illicit drugs or drug-taking accessible using non-age verified handset¥	2	Block access immediately, for non-age verified handsets, to thumbnails featuring depictions of illicit drugs or drug-taking	

O2 Age Verification Audit Standards <i>continued</i>			
	<i>Violations</i>	<i>Severity</i>	<i>Actions Required</i>
Adult <i>continued</i>	Billed services featuring horror themes accessible using non-age verified handset \uparrow	1	Block access immediately, for non-age verified handsets, to billed services featuring horror themes
	Unbilled services featuring horror themes accessible using non-age verified handset \uparrow	2	Block access immediately, for non-age verified handsets, to unbilled services featuring horror themes
	Thumbnails featuring horror themes accessible using non-age verified handset \uparrow	2	Block access immediately, for non-age verified handsets, to thumbnails featuring horror themes
	Billed services featuring imitable techniques accessible using non-age verified handset \emptyset	1	Block access immediately, for non-age verified handsets, to billed services featuring imitable techniques
	Unbilled services featuring imitable techniques accessible using non-age verified handset \emptyset	2	Block access immediately, for non-age verified handsets, to unbilled services featuring imitable techniques
	Thumbnails depicting imitable techniques accessible using non-age verified handset \emptyset	2	Block access immediately, for non-age verified handsets, to thumbnails depicting imitable techniques
Chat	PSMS unmoderated adult chat service operating on unapproved shortcode (i.e., 69, 79, or 89)	1	Discontinue PSMS adult chat service operating on unapproved shortcode immediately
	Failure to verify age of user attempting to access PSMS adult chat service	2	Age verify all users attempting to access PSMS adult chat service
	Failure to challenge user to verify age 18 or older before delivering adult chat service δ	1	Challenge all users to age verify before delivering adult chat service
	Failure to prevent user under 18 from participating in PSMS adult chat service	1	Block access to PSMS adult chat services for users confirming age under 18

\S This violation applies to sexual activity using sex toys or other such devices, activity with pubic areas and genitalia visible, and threats of sexual violence (e.g., rape). Material genuinely seeking to inform on matters of sexuality, safe sex, and health and where explicit images are the minimum necessary to illustrate and educate in a responsible manner might be permissible.

€ Material genuinely seeking to inform on matters of sexuality, safe sex, and health and where explicit images are the minimum necessary to illustrate and educate in a responsible manner is permissible.

β This violation applies to violence that dwells on infliction of pain or injuries or on sexual violence. In respect to mobile games, it applies to depictions of gross violence toward realistic humans or animals, such as scenes of dismemberment, torture, massive blood and gore, sadism, and other types of excessive violence.

¥ This violation applies to depictions that promote or encourage illicit drug-taking or provide instruction on using illicit drugs.

Ψ This violation applies to depictions of sustained or detailed inflictions of pain or injury, including sadism, cruelty, and depictions that induce an unacceptable sense of fear or anxiety.

\emptyset This violation applies to dangerous combat techniques, such as ear-claps, head-butts, and blows to the neck or use of easily accessible lethal weapons (e.g., knives). It can also apply to detailed descriptions of techniques that could be used in the commission of a crime.

δ Cite only when also citing "failure to verify age of user attempting to access PSMS adult chat service" or when the content provider does not use its own age verification system.

Section 8 – Documentation References

Useful Regulatory Websites

Useful Regulatory Websites

www.phonepayplus.org.uk

This is the site for the premium services regulatory PhonepayPlus. Details of the 12th Code, registration details and other useful information is located here.

PhonepayPlus 12th Code of practice:

<http://www.code.phonepayplus.org.uk/pdf/PhonepayPlusCOP2011.pdf>

Guidance notes:

<http://www.code.phonepayplus.org.uk/guidance-notes.html>

www.imcb.org.uk

The Independent Mobile Classification Body (IMCB) is the independent body appointed by the mobile operators to provide a Classification Framework for mobile content in particular to Adult Content.

www.short-codes.com

This is the Cross Network Shortcodes website which holds all the Cross Network regulatory documentation that applies to premium services. You can also check the availability and reserve shortcodes at this site.

Mobile Operator Premium Text Code Extension:

<http://www.short-codes.com/media/OperatorCodeExtensionv5.0.pdf>

www.payforituk.com

The Payforit website is where you can view or download the scheme rules and templates for your guidance in setting up Payforit services.

Trusted Mobile Payment Framework Scheme Rules:

<http://www.payforituk.com/docs/Payforit%203.0%20Published%2026%2002%2010.pdf>