

Your response

Question	Your response
<p>Question 1: Do you have any comments on our proposed approach to 'content and activity' which 'disproportionately affects women and girls'?</p>	<p>Confidential? – Y / N</p> <p>The Age Check Certification Scheme welcomes Ofcom's recognition of the unique risks faced by women and girls online and supports the categorisation of online gender-based harms such as online misogyny, intimate image abuse, and online domestic abuse. We believe the draft guidance is an important step forward in addressing these risks appropriately, however we believe it would be significantly strengthened by more explicit references to the use of age assurance measures as a foundational mitigation tool.</p> <p>The draft guidance explicitly acknowledges that young women and girls (especially aged 18–24) are at higher risk of gender-based online harm; without robust age assurance mechanisms in place, we believe service providers cannot effectively differentiate between adults and minors or apply tailored protections as a result.</p> <p>That being said, ACCS appreciates the urgency of taking targeted action to protect women and girls in the digital sphere and thanks Ofcom for the opportunity to respond to this timely consultation.</p>
<p>Question 2: Do you have any comments on the nine proposed actions? Please provide evidence to support your answer.</p>	<p>Confidential? – Y / N</p> <p>ACCS broadly supports the nine action areas, especially setting safer defaults (Action 5), giving users better control over their experiences (Action 7), conducting risk assessments that focus on harms to women and girls as well as enabling users who experience these harms to make reports (Actions 2 and 8 respectively), and ensuring governance and accountability processes address women and girls' safety appropriately (Action 1).</p> <p>Action 6: This action relates to reducing the circulation of content depicting, promoting, or encouraging online gender-based harm. While this is critical, ACCS believes that these algorithmic systems must be age-aware, integrating age assurance to ensure younger users are not driven towards misogynistic or harmful content through auto-suggestions or recommendation feeds.</p>

Question	Your response
	<p>Action 2: While Risk Assessments are a must, we believe they must explicitly address age-based risks in intersection with gender to be truly effective.</p>
<p>Question 3: Do you have any comments about the effectiveness, applicability or risks of the good practice steps or associated case studies we have highlighted in Chapter 3, 4 and 5? Are there any additional examples of good practices we should consider? Please provide evidence to support your comment.</p>	<p>Confidential? – Y / N</p> <ul style="list-style-type: none"> • Chapter 3 encourages platforms to conduct gender-sensitive risk assessments and suggests segmenting risks by age, gender, and intersecting characteristics. We believe these steps would be effective. • Chapter 4 recommends default privacy settings, better moderation, and age-appropriate controls. Again, we feel these steps would prove to be effective, especially the latter which takes age into consideration. • We also welcome the good practice highlighted in Chapter 5, recommending independent audits, regular civil society consultations, and clear governance structures. <p>ACCS recommends adding case studies involving:</p> <ul style="list-style-type: none"> • The deployment of privacy-preserving age assurance technologies; • Integration of standards-based age assurance tools in moderation or recommendation systems; and • The use of independent certification bodies to audit compliance with safety standards. <p>We also think that good practice should include third-party conformity assessments to verify that protective measures (such as user flagging, moderation, and content gating) are applied based on verified user characteristics, including age.</p>
<p>Question 4: Do you have any feedback on our approach to encouraging providers to follow this guidance, including our proposal to publishing an assessment of how providers are addressing women and girls’ safety? Do you have any examples or suggestions of other ways we could encourage</p>	<p>Confidential? – Y / N</p> <p>We support Ofcom’s emphasis on transparency and accountability and think publishing assessments detailing how well providers are addressing the risks to women and girls, is a good idea. This also goes for encouraging</p>

Question	Your response
<p>providers to take up the 'good practice' recommendations?</p>	<p>companies to integrate the guidance into their risk management systems and to demonstrate their progress through transparency reports.</p> <p>Though we acknowledge the difficulty in mandating providers to follow the guidance exactly, we would be interested in finding out how exactly Ofcom intends for providers to justify their approach and demonstrate equivalent or greater effectiveness. Transparency here is equally important.</p> <p>ACCS also believe the approach could be strengthened by:</p> <ul style="list-style-type: none"> • A voluntary but formal certification regime to validate platform implementation of safety standards; and • A public register that recognises providers demonstrating exemplary compliance which has been verified by independent assessment. <p>We think this approach would both incentivise providers and offer much needed reassurance to service users.</p>
<p>Question 5: Do you have any comments on our impact assessment, rights assessment, or equality impact assessment? Please provide any information or evidence in support of your views.</p>	<p>Confidential? – Y / N</p> <p>ACCS welcomes Ofcom's consideration of how the guidance might affect individuals with protected characteristics (under the Equality Act 2010), with a focus on eliminating discrimination and advancing equality of opportunity, particularly for women and girls who face disproportionate online harm. We also appreciate that the Rights Assessment takes into account freedom of expression and privacy, ensuring any restrictions would be necessary and proportionate.</p> <p>Further, we believe the assessments appropriately foreground gender-based and intersectional risks, but we urge a stronger focus on children's rights. In particular, we propose the right to digital protection and participation must be secured through the enforcement of age-appropriate experiences.</p> <p>Age assurance supports children's rights under Article 17 and Article 19 of the UN Convention on the Rights of the Child, as well as the UK ICO's Age-Appropriate Design Code. We recommend incorporating these frameworks</p>

Question	Your response
	<p>more explicitly into the equality and rights-based analysis.</p>
<p>Question 6: Do you agree that our draft Guidance is likely to have positive effects on opportunities to use Welsh and treating Welsh no less favourably than English? If you disagree, please explain why, including how you consider the draft Guidance could be revised to have positive effects or more positive effects, or no adverse effects or fewer adverse effects on opportunities to use Welsh and treating Welsh no less favourably than English.</p>	<p>Confidential? – Y / N</p> <p>We have no comments for this question.</p>

Please complete this form in full and return to OS-Section54@ofcom.org.uk.