

Consultation response form

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? – N</p> <p>I am pleased to see systemic inequalities recognised and named as something providers should pay particular attention to. The categories of content and activity identified cover relevant areas and pain points affecting women and girls.</p> <p>Given the language used throughout the guidance, however, I am concerned that pornography is going to be framed solely as a harm and as content that “cements misogynistic ideas or behaviours, including through the normalisation of sexual violence.” Porn <i>can</i> do it, but doesn't do it <i>by default</i>. Seeing porn – a form of entertainment – in the same category as self-harm and eating disorder content distorts its impact, pathologises sex and sex workers (who are at least recognised as victims of VAWG here, which is heartening), and lets states and platforms off the hook for their lacking education and governance.</p> <p>There is no evidence that non-violent porn is associated with sexual aggression. A study from 2020 even highlighted methodological flaws in studies that suggested links between porn and violence - and while researchers found there may be association between porn consumption and certain behaviours, they weren't able to establish the existence of causal links between porn and violence. Even conflating BDSM - bondage, discipline, sadism and masochism - with sexual violence misrepresents the practice <i>*and*</i> abuse: it excuses sexual violence as a form of sex, while also creating negative stereotypes against the kink and BDSM communities, who place a strong emphasis on consent before any act is performed. Even if porn may portray conventional gender roles and have misogynistic tropes, even mainstream entertainment does - while not <i>all</i> porn is the same.</p> <p>There is, however, plenty of evidence surrounding lacking sex and pleasure education in schools and in our society, leading those who are too young to seek any representation of sex towards arousal and/or advice, without sufficient information or education about it. This fits with your literacy remit, which shouldn't be something provided by platforms</p>

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	<p>alone but by schools and the state. There is also plenty of evidence surrounding the harms of pathologising sexual behaviours, sex, sexual pleasure, and censoring content, which does nothing to solve the demand for it, but does push behaviours, feelings, workers and practices underground.</p> <p>Therefore, this guidance must ensure platforms do not react by protecting their economic interests and engage in blanket banning altogether, because it's so much easier for them to automate detection that considers all bodily displays as porn and all porn as harm.</p> <p>More info here:</p> <p>Attwood F, Bale C and Barker M (2013). The sexualisation report. https://thesexualizationreport.files.wordpress.com/2013/12/thesexualizationreport.pdf</p> <p>Cense M (2019) Rethinking sexual agency: proposing a multicomponent model based on young people's life stories. Sex Education 19(3): 247-262. https://www.tandfonline.com/doi/full/10.1080/14681811.2018.1535968</p> <p>Ferguson CJ & Hartley RD (2022) Pornography and Sexual Aggression: Can Meta-Analysis Find a Link? Trauma, Violence, & Abuse, 23(1), 278-287. https://doi.org/10.1177/1524838020942754</p> <p>Hancock J (2016) Does Porn Harm Young People? Bish Training. https://bishtraining.com/does-porn-harm-young-people/</p>
<p>Question 2: Do you have any comments on the nine proposed actions? Please provide evidence to support your answer.</p>	<p>Confidential? – N</p> <p>The nine actions outlined are a positive step towards accountability and change. It's fantastic to see suggestions to appoint independent ombudsmen and oversight bodies to scrutinise platform power, and it's great to see recommendations to work with survivor-led organisation to provide support and improve governance. Granular content controls, power over user privacy and visibility are steps users I have worked with also recommended: https://digitalcitizens.uk/blog/platform_governance_inequalities/</p>

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	<p>The automatic defaults however have, in the past, been an excuse for platforms to apply them non-consensually without informing users. Instead, these options should be visible upon sign-up and be the subject of periodic check-ins throughout users' experience.</p> <p>Additionally, building accountability must also take governance processes in full consideration: transparency is the antithesis of what platform companies want, because it forces them to publicise the way they are run, their processes and information about their black boxes. In my experience of working with platforms, I have found there are <i>external</i> guidelines we can all read, and <i>internal</i> guidelines employees enforce. This information discrepancy must stop to truly give users control of their experience.</p> <p>This transparency must be built into regulation and oversight more than in guidance, otherwise platforms will continue weaponizing their technical knowledge against scrutiny towards avoiding costly interventions and perpetrating harms such as gaslighting towards the public. E.g. see here:</p> <p>Divon, T., Are, C., & Briggs, P. (2025). Platform gaslighting: A user-centric insight into social media corporate communications of content moderation. <i>Platforms & Society</i>, 2. https://doi.org/10.1177/29768624241303109</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? – N</p> <p>Transparency</p> <p>It's heartening to see an emphasis on transparency reporting, and on the need to understand which posts are flagged automatically and which ones are reported.</p> <p>Transparency reporting also needs to be effective and detailed, and not reliant on mere figures but on the context in which decisions were made, for society to truly learn how platforms are actually governing. This goes hand in hand with issues of researcher access, e.g. see here:</p> <p>Are, C. (2024). Researching under the platform gaze: Rethinking the challenges of platform governance research. <i>Platforms & Society</i>, 1. https://doi.org/10.1177/29768624241283912.</p> <p>It's also worth adding that there currently is no information about flags, their effectiveness, uptake and misuse, and that appeals for non-violating content have been negligent and ineffective. Information about these</p>

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	<p>governance practices is therefore essential and must be part of transparency efforts, e.g. see here:</p> <p>Are, C. (2024). Flagging as a silencing tool: Exploring the relationship between de-platforming of sex and online abuse on Instagram and TikTok. <i>New Media & Society</i>, 0(0). https://doi.org/10.1177/14614448241228544</p> <p>Are, C. (2024). The assemblages of flagging and de-platforming against marginalised content creators. <i>Convergence</i>, 30(2), 922-937. https://doi.org/10.1177/13548565231218629</p> <p>Are, C. (2024). 'Dysfunctional' appeals and failures of algorithmic justice in Instagram and TikTok content moderation. <i>Information, Communication & Society</i>, 1–18. https://doi.org/10.1080/1369118X.2024.2396621</p> <p>Sexualisation</p> <p>The guidance would benefit from including the fact that sexualisation can be part of platform governance too, and therefore enacted by platforms.</p> <p>Blanket bans focusing on nudity detection assume that nudity is inherently sexual, snowballing onto sexualised governance by algorithms and moderators. On most platforms, nudity and sexual activity come under the same policy, stigmatising nudity, education, art and expression and applying unwanted sexual labels to bodies.</p> <p>E.g. see here: Are, C. (2023). An autoethnography of automated powerlessness: lacking platform affordances in Instagram and TikTok account deletions. <i>Media, Culture & Society</i>, 45(4), 822-840. https://doi.org/10.1177/01634437221140531.</p> <p>A governance that truly empowers women and girls would recognise their bodily autonomy and expression, focusing on context and behaviours instead of stigmatising sex and bodies as harmful. The censorship that platforms apply to women's bodies affects the sex education that young people need to see online to be able to spot misogyny in content by manosphere influencers.</p> <p>Actions</p> <p>Empowering users to block, mute and make reports is important but still puts the onus to avoid harm on them. The users I worked with suggested being able to add friends or collaborators to their profile to allow them to block, mute and filter keywords to reduce the load: https://digitalcitizens.uk/blog/platform_governance_inequalities/.</p>

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<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 providers to take up the 'good practice' recommendations?</p>	<p>Confidential? – N</p> <p>Research has found that platforms react to negative media coverage with changes in policy, so naming and shaming platforms that are underperforming in your assessment is a good strategy.</p> <p>Marchal, N., Hoes, E., Klüser, K. J., Hamborg, F., Alizadeh, M., Kubli, M., & Katzenbach, C. (2024). How Negative Media Coverage Impacts Platform Governance: Evidence from Facebook, Twitter, and YouTube. <i>Political Communication</i>, 1–19. https://doi.org/10.1080/10584609.2024.2377992</p> <p>This is because platform governance still largely runs through PR. However, with the recent changes to platforms like Meta following Trump's re-election, it remains to be seen how negative failing to tackle misogyny will look to Zuckerberg 2.0. Instead, regulation (and not guidance) should force platforms to act like public services, to be fully transparent about their processes and to give researchers and regulators access about their processes.</p> <p>Of course, women and girls make up a good size of platforms' userbase so naming and shaming may still threaten their bottom line and have an effect. But often, these changes are cosmetic, which is why we need access to the making and the workforce behind algorithms (e.g. product people) to change the game that boosts the engagement of harmful content.</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? – N</p> <p>My only comment is that platforms have grown exponentially fast, built by a technical workforce whose expertise greatly outstrips that of the average user. Yet, the average user has very little say in the matter of how technologies they use will affect them, and they don't have access to explanations, literacy and feedback options. It's right that the guidance asks platforms to engage in literacy initiatives, but to truly empower users we need to break up the monopolies that allow platform power to continue acting as it does, and treat platforms like any other private service provider. Legislation tackling harms doesn't cut it – we need to tackle anti-trust, competition, design, transparency, ownership and public service roles too. See: <i>Internet For The People</i>, by Ben Tarnoff.</p>
<p>Question 6: Do you agree that our draft Guidance is likely to have positive effects on opportunities to use Welsh and treat-</p>	<p>N/A</p>

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<p>ing 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>	

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