

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? – No</p> <ul style="list-style-type: none">● Bumble Inc. wholeheartedly supports the production by Ofcom of dedicated industry draft Practical Guidance outlining how providers can take action against harmful content and activity that disproportionately affects women and girls, in recognition of the unique risks they face. We commend Ofcom's effort in drafting guidance informed by victims, survivors, advocacy groups, and safety experts, ensuring it reflects the lived experiences of those affected.● Bumble is a women-first dating app that was created out of a desire to infuse kindness, love, and equity into relationships as a protection against toxicity, abuse and loneliness. Everything we do - both within and beyond Bumble - is rooted in our mission to bring people closer to love, in whatever form it may take. We believe the best way to achieve our mission for all people is by designing and building through a women's lens across all of our products. We know that by creating a platform that is anchored in making women feel safe, we encourage a kinder environment for everyone. Cultivating a culture of responsible innovation to tackle online toxicity and misogyny is a multistakeholder endeavour, and we believe that technology platforms must play a central role in making this the new normal for our digital spaces. This includes advocating for policies that raise the standards for healthy and equitable relationships online and off.● We have consistently advocated for the Online Safety Act to explicitly acknowledge the disproportionate experience and impact that certain online harms have on women, and to

empower the government, regulator, and services in scope to address and prioritise women's online safety. Indeed, Bumble recommended in its May 2022 [Written Evidence on the Online Safety Bill](#) that it should include new duties of care addressing online Violence Against Women and Girls (VAWG) and empower Ofcom to produce a dedicated code of practice to combat online VAWG and address emerging harms affecting women.

- Today, we view the draft Practical Guidance for Tech Companies as an important initial step in this direction. We therefore **support Ofcom's proposed approach to 'content and activities'** aimed at fostering greater accountability, preventing disproportionate harms faced by women and girls, and developing effective support mechanisms. We agree that addressing the broader risks faced by women and girls online requires a holistic approach extending beyond illegal content. Accordingly, we support Ofcom's approach to build upon foundational protections in its Codes and risk assessment guidance by introducing further good practices for tech companies to enhance online safety for women and girls.
- If voluntary in nature, this new Practical Guidance underscores the need for stronger actions to protect women and girls from pervasive online harms. It sends a strong signal that more could - should be - done by the tech industry as a whole, regardless of the company size. However, to ensure widespread industry adoption, including smaller companies with fewer resources, **continuous engagement** among industry players, public bodies, civil society, academia, and law enforcement will be crucial to identify pathways through which Ofcom can encourage, monitor, and evaluate guidance adoption by all online service providers.

- Additionally, we welcome the **recognition of the systemic and intersectionality** of online gender-based harms. At Bumble, we know our members are not a homogenous group and do not all benefit from the same type of support. We consider how identity, vulnerabilities, experiences, knowledge, and skills shape members' experiences on our products, which makes us hyper vigilant to providing trauma-informed and survivor-centred support and recovery. When designing products that are to be used by diverse groups, we consider experiences related to protected characteristics such as gender, race, and sexual orientation (and the intersection of such characteristics) as well as cultural differences. This means that we are thoughtful about infusing a gendered lens into each stage of our design and development processes. Using an intersectional framework, we address behaviors deeply rooted in gendered racism. For example, we revised our Community Guidelines to classify [unsolicited fetishisation](#) - sexual fascination with non-sexual attributes such as race, gender, or sexuality - as sexual harassment, banning such behavior from our platform.
- We also recognise the **unprecedented nature** of the draft Practical Guidance acting as comprehensive, legally grounded directives specifically aimed at addressing online harms that disproportionately affect women and girls. This comprehensive approach positions Ofcom's Practical Guidance as a pioneering effort in the global regulatory landscape. We see this as a tremendous **opportunity to collaborate with other regulators globally** to develop, enhance and promote higher norms and standards to address gender-based online harms. Regular reviews and assessments of guidance implementation can serve as

valuable resources to identify existing and emerging harms affecting women and girls online, evaluate existing solutions, and pinpoint gaps.

- Emerging technologies introduce new harms, necessitating **adjusted approaches** to prevent online VAWG. While emerging technologies have predominantly enhanced daily life, women continue to bear the brunt of their negative consequences, facing disproportionate levels of online harassment and abuse. As well documented throughout the draft Guidance, not only do these violences have a devastating impact on the mental and physical health of victims, but also lead to their withdrawal from the online world. Ultimately, reducing their participation in democratic debate, and reinforcing inequalities. The [UN Secretary-General's October 2024 report](#) highlights three key current challenges: backlash against women's rights, the rapid rise of artificial intelligence (AI), and the spread of misogynistic "manosphere" content into mainstream culture. AI can intensify violence against women and girls in numerous ways, both through the deliberate spread of targeted disinformation, generation of non-consensual sexualised deepfakes or through the automated, large-scale and often-unintended promulgation of misinformation. These new forms of tech-enabled violence are part of a broader continuum linking online and offline harm. Therefore, regulations should be **regularly reviewed** in partnership with industry, and Ofcom should maintain ongoing engagement with platforms to identify emerging threats and share best practices.
- Lastly, not only foundation and good practices steps should be regularly reviewed in light of emerging harms but also avoid unintended consequences. For example, we know that a

	<p>concern of victim-survivors is being unmatched by perpetrators of abuse or harassment after an incident has occurred. Bumble's Unmatch feature has been specifically designed to provide a guardrail against this type of behaviour, as it preserves a conversation for our moderators, should the victim-survivor wish to make a report to our team. So victim-survivors who have concerns about the removal of evidence should know that this is protected against on Bumble.</p>
<p>Question 2: Do you have any comments on the nine proposed actions? Please provide evidence to support your answer.</p>	<p>Confidential? – No</p> <ul style="list-style-type: none">• We welcome Ofcom's approach, which draws on the 'safety-by-design' principles - understood in the draft Practical Guidance as a proactive strategy for integrating safety considerations into the design cycle of products, systems, or processes - to develop the nine relevant actions and identify foundational and good practice steps. While there is broad consensus on the importance of deeply embedding safety within the norms governing the technology sector, interpretations and implementations of safety-by-design principles vary widely across the industry. Awareness of the need to address online toxicity and misogyny, in particular, has emerged relatively recently due to a historic lack of consideration for gender dynamics and power relations in the design of internet technologies aimed at preventing gender-based violence. Instead of minimising safety risks because we would rather believe people would not abuse the opportunity, we embrace risk analysis as a vital part of the product life cycle.

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.

[REDACTED]

[REDACTED]

[REDACTED]

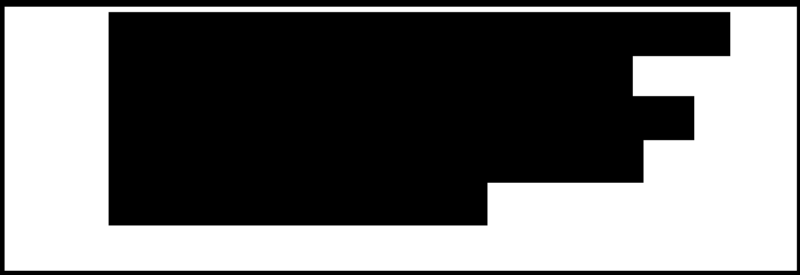
[REDACTED]



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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?

Confidential? – No

- **We support the third objective outlined in the Draft Practical Guidance, which aims to encourage service providers to actively pursue measures ensuring a safer online environment for women and girls.**
Specifically, we endorse the proposal for publishing assessments detailing how providers are safeguarding women and girls on their platforms. Such transparency and public availability of information significantly enhance provider accountability, empower users to make informed decisions, and enable platforms to benchmark their practices against industry-leading standards.
- However, the current draft Practical Guidance **provides limited clarity** regarding the methodology Ofcom intends to use for conducting these assessments, offering only a broad overview of planned actions. According to the draft, assessments will integrate insights from broader regulatory activities on online safety, evaluate providers' application of the Guidance, incorporate expert evidence, and gather feedback from women and girls across the UK. We believe it would be beneficial for Ofcom to explicitly clarify how it will collect and analyse evidence regarding providers' implementation of the Guidance and how this evidence will inform the final assessments.
- In particular, we advise caution against direct comparisons of data points across platforms, as moderation approaches and policies can

	<p>differ significantly. For example, Bumble’s Community Guidelines prohibit victim-blaming and shaming, provide a more expansive definition of sexual harassment than industry standards - defined to be any non-physical, unwanted, and unwelcome sexual behaviors between members - resulting in proportionately higher moderation activity. Such actions, however, may not correspond directly with moderation practices on other platforms, where definitions or thresholds for intervention differ significantly.</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>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>