



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>Essity is a global, leading hygiene and health company. We manufacture a range of products including products aimed at women and girls including period products, Bodyform and Modibodi.</p> <p>We support efforts to tackle online gender-based harms and appreciate that this is a complex task. It is critical to make sure that illegal and harmful content is removed. A survey of 4000 people conducted by Essity in April 2025, found that of those who use social media, 48% have been exposed to foul and abusive language, 44% to misinformation, and 41% to sexist content.</p> <p>However, the ability of users to express themselves freely online must be protected. This includes enabling women and girls to speak out and have their voices heard.</p> <p>Essity is currently working in partnership with CensHERship to raise awareness of the social media censorship of women's health and wellbeing content. This censorship happens across all social media platforms. It silences and suppresses brands, educators, charities and content creators.</p> <p>In 2023, Bodyform's campaign for period products was silenced on social media for its use of anatomically correct names for body parts. Bodyform then launched Vagina's Uncensored which revealed words that are commonly censored on social media — including vulva, vagina, clitoris and discharge.</p> <p>Often described as 'shadow banning', social media censorship can range from certain words associated with women's health (period, vagina, vulva etc) being restricted and their use impacting the reach of content, through to paid-for ads featuring women's health and sexual wellbeing products being routinely banned. Many posts (organic and paid-for) are taken down after launch</p>

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	<p>or suppressed, and comments and profile bios are being censored.</p> <p>In 2024 research from CensHERship found that 95% of respondents had experience of social media censorship of women’s health issues over the past year. Examples shared include:</p> <ul style="list-style-type: none"> - A campaigner raising awareness of vulval cancer whose account was restricted for the use of the word vulva and vagina - A breast cancer awareness campaign having to show a male nipple instead of a female one - A sex education account deleted on instagram and unable to run any ads for courses on sexual education - A brand creating a carousel on instagram containing the words vaginal microbiome - it was rejected 5 times until the words were removed. - A nude shoulder flagged as sexual content <p>Shadow banning can harm women and girls by amplifying stigma around women’s bodies by silencing education, disrupting support networks, and perpetuating taboos. This deepens misconceptions and shame.</p> <p>Women are not being allowed to own the narrative around their own bodies, female bodies are viewed through the lens of male sexuality and female-led brands cannot grow. Women are missing out on potentially life-saving information from charities and women’s health campaigns. It is important to note that this is not the case for men’s health and the language used to describe male bodies.</p> <p>Whilst we strongly support measures to reduce gender-based harm, we are concerned that an unrefined or blanket approach taken by social media platforms may bring with it the unintended consequence of restricting the ability of women to talk and find information about their bodies online. It is critical that the impact of shadow banning on women’s health is understood and considered as part of this guidance.</p>
<p>Question 2: Do you have any comments on the nine proposed actions?</p>	<p>Confidential? – N</p> <ul style="list-style-type: none"> - Action 2: Risk assessments that focus on harms to women and girls

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<p>Please provide evidence to support your answer.</p>	<p>Social media companies should also be required to assess the risk of overly censoring women’s health by applying blanket censorship systems to posts. This is particularly important when creating systems that tag the use of language referring to women’s bodies (breast, cervix, clitoris etc)</p> <ul style="list-style-type: none"> - Action 3: Be transparent about women and girls’ online safety There is currently little to no transparency about how and why users are ‘shadow banned’. We agree that social media platforms should provide more detail about which posts are flagged, and why, by automated content moderation, active bystanders, and the targeted users themselves. - Action 8: Enable users who experience online gender-based harms to make reports When users are shadow- banned it is very difficult to report or resolve with the social media platforms. Respondents to a CensHERship survey made multiple attempts to contact social media platforms: <ul style="list-style-type: none"> - 50% contacted them 1-5 times in last 12 months - 25% contacted them 6-10 times - 3% 11-15 times - 9% contacted them more than 15 times in last 12 months CensHERship research found that only 2% of those who thought they had been ‘shadow banned’ were satisfied with the response from social media platforms. As well as enabling users to report gender-based harms there should be a clear system and process for reporting the censorship of legitimate accounts, particularly those focused on women’s health. It may be appropriate to establish a parallel scheme to the ‘trusted flagger programme’ so that credible organisations or businesses with a legitimate interest in women’s health can be flagged as ‘safe’ in partnership with other organisations that have relevant expertise. This scheme

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	would allow concerns to be escalated and put in context.
<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 As above</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 providers to take up the ‘good practice’ recommendations?</p>	<p>Confidential? –N No</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 No</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</p>	<p>Confidential? –N N/A</p>

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