

Your response

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<p>Question 1: Do you have any comments on our proposed approach to 'content and activity' which 'disproportionately affects women and girls'?</p>	<p>I disagree that the content outlined disproportionately impacts women and girls. This applies both to pile ons, (20% male victims, 15% female), risks to journalists (murders of journalists, are 93% male, 7% female) intimate image abuse (90% sextortion victims male, 10% female), the underreporting of online domestic abuse (12% male victims report vs 25% female victims), and in other areas outlined in the consultation document</p> <p><u>The areas outlined in the consultation document (85 pages) should therefore be excluded as content which disproportionately affects women and girls</u></p> <p>It also suggests that the methodology for identifying such content and activity is deficient.</p> <p>By way of process Ofcom have consulted interest groups which are uncritical of the starting assumption that content disproportionately affects women and girls. This creates an 'echo chamber' of mutually uncritical/ non-self-critical views, in which men and boys, their views, and the impact on them are ignored, or not equally explored.</p>

Question 2: Do you have any comments on the nine proposed actions? Please provide evidence to support your answer.

Regarding proposed action 1- 'Governance and Accountability processes address online gender-based harms', such processes must address gender-based harms to men and boys. That includes misandry and gender-based abuse of men and boys. Although not directly enacted by Section 54, to fail to do so would be to discriminate against men and boys in terms of protection from harm, in contravention of the UK's obligations under the Sex Discrimination Act, Equality Act, and Human Rights Act.

This similarly applies to proposed action 2 - Conduct risk assessments that focus on harms ..' Any such risk assessments should also include harms to men and boys. Otherwise, the resulting actions will produce a discriminatory service by providers, and Ofcom will also have discriminated in the exercise of its functions as a public body.

The inclusion of men and boys' safety is particularly important in relation to proposed action 3 'Transparency', otherwise men and boys will lose confidence in Ofcom as a public body, that it can exercise

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	<p>its functions in a way that it is not discriminatory to men and boys.</p> <p>Proposed action 5, Set safer defaults. Insofar as this is a gender-neutral provision to apply to blocking of material coming into social media or other accounts, no objection. Defaults which require additional information to use accounts, however, introduce disproportionate impacts on privacy.</p> <p>Proposed action 6 - 'Reduce the circulation of content depicting, promoting, or encouraging online gender based harms'. I disagree with this provision. See comments on proposed action 1. A lot of material has been classified as gender based harms against women, when it is not so. It may have gender-neutral impact, or more impact on men. Also, the broad concept of harm, to effectively include 'objection' or 'dislike', means that the proposal is likely to cut too deeply into freedom of expression to be worthwhile. It is to be noted that Ofcom already has illegal content and protection of children codes of practice. It is not proportionate to add additional layers of censorship.</p> <p>Proposed action 7 - Give users better control over their experiences'. Insofar as this is a gender-neutral provision, which does not impact on censorship, no objection. There is a danger that individuals will be increasingly singled out, however, if they do not elect for the most restrictive options over their online experiences, impacting on freedom of expression, and the ability to impart and receive ideas.</p> <p>Proposed action 8- 'Enable users who experience online gender-based harms to make reports'. The reporting system could result in unacceptable censorship of the internet. That is because what is 'gender-based' and what is a 'harm' are so often incorrectly classified. It is also because there is a distinction between something someone might object to, and something which is harmful to them. There is no generalised right to protection from taking offence in the uk, nor should there be a gender-based one.</p> <p>Proposed action 9 - 'Take appropriate action when online gender-based harms occur.'. Disagree, for the reason as in 8 above.</p>
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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.

I have concerns regarding the effectiveness, applicability, and risks of the good practice steps and case studies outlined in Chapters 3, 4, and 5. These concerns relate to evidence quality, discriminatory implications, and lack of gender balance.

1. Risk of Gender Bias in Framing and Implementation

Ofcom are enacted to identify online harms which may disproportionately affect women and girls.

However, the case studies and good practice steps overwhelmingly focus on women and girls as victims of online harm, with minimal – if any – recognition of the risks and harms experienced by men and boys, or individuals of other gender identities. This makes the good practice steps potentially discriminatory where these are not framed in a gender neutral way.

For example:

- The case studies in Chapter 5 (e.g. Bumble, Glitch, Women’s Aid) are framed exclusively around female users.
- The examples fail to acknowledge gender-neutral tools or practices that support *all* users' safety.

This introduces a systemic bias in how “good practice” is framed – making it potentially discriminatory to platforms or users seeking to address abuse toward men and boys, or to those who experience online harms (e.g. male victims of domestic abuse, misandry, sexual extortion, false allegations, etc)

2. Applicability is Limited by Lack of Nuanced Evidence

The good practice steps rely heavily on qualitative stakeholder engagement and anecdotal experience. While survivor-led input is valuable, the following risks arise:

- Lack of representative data: There is no robust comparative analysis of harms by gender, age, or role (e.g. as journalist, gamer, creator).
- Unsupportable generalisation across sectors: Many case studies focus on dating or advocacy platforms, not on more general-purpose services

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	<p>where abuse dynamics and reporting behaviours may differ.</p> <p>Without a more nuanced evidence base, the applicability of these practices to broader platforms is questionable.</p> <p>3. Risks to Freedom of Expression and Fairness</p> <p>Many of the practices encourage automated moderation, proactive takedowns, and design-level content filtration, without robust safeguards for:</p> <ul style="list-style-type: none">• Due process for accused users.• Protection of controversial or minority opinions.• Transparency around what qualifies as "gender-based harm", which remains ill-defined, and potentially discriminatory in application. <p>This could lead to disproportionate censorship or discrimination against users whose content is mischaracterised, especially men raising dissenting views on gender, abuse, or public policy.</p> <p>4. Additional Good Practices That Should Be Considered</p> <p>To enhance both fairness and effectiveness, I suggest Ofcom consider the following additional good practice examples:</p> <ul style="list-style-type: none">• Gender-neutral safety design: Platforms like Reddit and Discord offer safety tools (e.g., keyword filters, moderation logs, community governance) that protect all users without gendered presumptions.• Support for male victims: Projects such as <i>Men's Advice Line</i> (UK) and <i>1in6.org</i> (US) offer support frameworks for male victims of abuse. These could inform how services engage with underreported abuse among men and boys.• Balanced stakeholder consultation: A good practice should include consultation processes that represent <i>diverse gender perspectives</i>, rather than relying solely on groups focused on one gender. <p>Conclusion</p>
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	<p>The good practice steps and case studies presented reflect a commendable commitment to addressing online harm, but they suffer from a narrow framing that limits both their applicability and legitimacy. A more inclusive and evidence-led approach would:</p> <ul style="list-style-type: none"> ● Ensure practices are effective for all genders. ● Reduce the risk of discriminatory outcomes. ● And strengthen provider and public trust in the regulatory framework. <p>I urge Ofcom to revise any future case study selection and practice recommendations to reflect the diversity of online experiences – including harms disproportionately affecting men and boys – and to ensure all guidance is grounded in robust, comparative evidence.</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>I have concerns and suggestions regarding Ofcom’s approach to encouraging providers to follow the draft guidance, particularly in relation to the proposed publication of provider assessments and the broader promotion of good practice.</p> <p>1. Risk of Regulatory Imbalance and Reputational Pressure</p> <p>Ofcom are not empowered specifically to publish provider assessments under Section 54.</p> <p>Ofcom’s proposal to publish assessments of how providers address the safety of women and girls <u>exclusively</u>, raises serious concerns around fairness, proportionality, and equal treatment.</p> <p>Specifically:</p> <ul style="list-style-type: none"> ● Selective focus on one group (women and girls) without equivalent assessments on how providers address harms to men and boys, non-binary individuals, or other vulnerable user groups may create an imbalance in public accountability. ● This could result in reputational penalties for platforms that prioritise actual equality by taking
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a broader view of harm than gender exclusive focus, and therefore promote gender-neutral safety design or take a broader, inclusive approach not fully aligned with the current framing.

- Providers may be pressured into adopting narrow gender frameworks, not because they are the most effective or fair, but to avoid negative public reporting by Ofcom.

Ofcom, as a public body, must ensure its methods of encouraging compliance do not amount to indirect discrimination, nor incentivise providers to skew safety priorities in a way that overlooks other at-risk groups.

2. Need for Transparent, Evidence-Based Metrics

If Ofcom proceeds with publishing assessments, it is essential that:

- The criteria for evaluation are evidence-based, balanced, and published in advance.
- Providers are assessed on overall effectiveness in reducing harm for all users, not merely on their alignment with gender-specific language or narratives.
- Assessments allow for contextualisation of platform risks (e.g. audience demographics, platform type, harm profiles) rather than imposing a one-size-fits-all standard.

Without such safeguards, there is a risk that Ofcom's public assessments may undermine credibility, both of the regulator and the Online Safety regime more broadly, and open Ofcom to action for indirect discrimination.

3. Alternative and Supplementary Approaches

To promote meaningful uptake of good practice without creating perverse incentives, I recommend Ofcom also consider the following approaches:

- Incentivise innovation and inclusivity: Highlight and reward platforms that develop inclusive, user-led safety tools that work across gender, age, and risk types. For example, systems that

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	<p>empower users with granular controls or improve transparency of moderation processes.</p> <ul style="list-style-type: none"> ● Support capacity building for smaller platforms: Provide voluntary toolkits, safety templates, or co-designed workshops with a diversity of user and advocacy groups (including those representing men and boys, LGBTQ+ users, etc.), to improve real-world uptake without disproportionate burden. ● Promote data transparency: Encourage platforms to publish disaggregated harm data (by gender, age, role, etc.) so that all stakeholders – including Ofcom – can engage in more informed policy development. ● Facilitate neutral peer review forums: Create spaces where platforms can share good practices, seek peer feedback, and iterate without fear of reputational damage. This encourages experimentation and honest reporting over box-ticking. <p>Conclusion</p> <p>While public accountability is important, the current proposal to publish assessments only on providers’ efforts to protect women and girls introduces risks of partiality and reputational coercion. A more balanced and inclusive framework would:</p> <ul style="list-style-type: none"> ● Encourage effective practices that protect all users. ● Build trust across the technology sector. ● And maintain Ofcom’s credibility as an impartial, evidence-led regulator. <p>I therefore urge Ofcom to consider widening the scope of its assessments and to implement additional, constructive incentives that promote more inclusive, rights-respecting online safety practices.</p>
<p>Question 5: Do you have any comments on our impact assessment, rights assessment, or equality impact assessment? Please provide any</p>	<p>I have significant concerns about the Equality Impact Assessment (EqIA) and associated rights and impact</p>
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information or evidence in support of your views.

assessments as presented or implied in this consultation. Specifically, the assessments:

1. Fail to Address Gender-Based Harms Against Men and Boys

The consultation frames certain types of content and online activity as “disproportionately” impacting women and girls yet does not provide a transparent methodology for establishing this claim. Available data suggests otherwise.

For example, the covering document ‘Ofcom calls on tech firms to make the online world safer for women and girls’, outlines risks which are presumably intended to be quintessential examples of online harms disproportionately affecting women and girls. However, a further analysis suggests that even these supposed gender based harms against women and girls, may actually be gender neutral, or to represent gendered risks in aspects, against men and boys e.g.

- **Pile-ons:** According to the Ofcom Illegal Harms consultation data, 20% of male respondents and 15% of female respondents reported experiencing pile-ons.
- **Journalist risks:** UNESCO data shows 93% of murdered journalists are male.
- **Intimate image abuse/sexortion:** The vast majority of sextortion victims globally are male.
- **Domestic abuse underreporting online:** Male victims report abuse at significantly lower rates (12%) compared to female victims (25%), indicating systemic underrepresentation in data collection and support.

The failure to include or acknowledge these facts calls into question the neutrality and completeness of the equality assessment.

2. Presents a Skewed, Non-Inclusive Process

Ofcom’s consultation process appears to have relied heavily on engagement with stakeholders that uncritically support the assumption in relation to harms, that they disproportionately affect women and girls. This has resulted in an “echo chamber” effect, where:

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- Counter-evidence regarding harms to men and boys is either overlooked or dismissed.
- Stakeholders critical of the consultation's gendered assumptions are seemingly excluded.

This raises procedural fairness concerns under the **Equality Act 2010**, which requires public bodies to eliminate discrimination and advance *equality of opportunity for all protected characteristics*, including sex.

3. Risks Discriminatory Application of Regulation

Proposed actions 1–9 consistently reference “gender-based harms” with a focus almost exclusively on women and girls, without equivalent frameworks or protections for men and boys. This asymmetry could:

- Encourage **platform-level discrimination**, where service providers tailor responses only toward one gender group.
- Lead Ofcom, as a public authority, to breach its **Public Sector Equality Duty (PSED)** by failing to consider the impact of its actions on all genders equitably.
- Create the perception that Ofcom does not acknowledge men and boys, thus undermining public trust and compliance.

4. Oversteps Proportionality and Rights Protections

The broad and loosely defined concept of “gender-based harm” – especially when tied to user reports, content moderation (actions 6–9), and default settings (action 5) – risks infringing upon:

- **Freedom of expression** under Article 10 of the Human Rights Act.
- **Freedom from discrimination** under Article 14.
- And the UK's general constitutional principles of **proportionality** and **non-censorship**.

The EqIA and rights assessment fail to balance these rights carefully or to present a nuanced approach that recognises that content may be:

- **Gender-neutral in effect.**

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	<ul style="list-style-type: none"> • Or even more harmful to men and boys, contrary to assumptions in the draft guidance. <p>Conclusion</p> <p>The equality and rights assessments require urgent revision. I would recommend:</p> <ul style="list-style-type: none"> • Commissioning a balanced, transparent EqIA that assesses harms to <i>all</i> sexes with empirical rigour. • Engaging with a broader, more diverse range of stakeholders, including those representing men and boys. • Reframing “gender-based harms” language to ensure it captures the full spectrum of online abuse, rather than embedding a gender bias into regulation. <p>Failing to do so risks undermining both the legitimacy of the regulatory framework, undermining the public’s confidence in Ofcom’s impartiality, and opening Ofcom to legal action for discriminatory practice.</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>No comment.</p>

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