

**WARNING: This consultation response contains language and/or material that may be distressing**

**LinkedIn Corporation's Response to Ofcom Consultation titled  
"A safer life online for women and girls: practical guidance for tech companies"**

23 May 2025

We write in response to the Consultation document issued 25 February 2025 titled "Consultation on draft Guidance: A safer life online for women and girls." LinkedIn thanks Ofcom for taking a reasonable and balanced approach in its Guidance and welcomes the opportunity to consult and share LinkedIn's unique perspective on Ofcom's proposed Guidance for the protection of women and girls.

**I. Background**

**A. About LinkedIn**

LinkedIn is a real identity online social networking service for professionals to connect and interact with other professionals, to grow their professional network and brand, and to seek out jobs and other career development opportunities.

LinkedIn's vision is to create economic opportunity for every member of the global workforce. Its mission is to connect the world's professionals to make them more productive and successful. To that end, LinkedIn offers its registered, logged-in members certain core functionalities, including the ability to create a LinkedIn member profile, join LinkedIn groups, post content, interact with others' content, connect, communicate, follow, and otherwise engage with other LinkedIn members. Members use these services to connect with other professionals, stay informed about the world of work, hire, get jobs, and to learn.

In these ways, LinkedIn is part of its members' professional identity and has a specific purpose. Activity on the platform and any content members share can be seen by current and future employers, colleagues, potential business partners and recruitment firms, among others. Given this audience, members tend to limit their activity to professional areas of interest and expect the content they see to be professional in nature.

**B. Safety measures implemented by LinkedIn**

LinkedIn operates under standards of professionalism, which are reflected in the [Professional Community Policies](#) with which all members must comply. These content policies bolster a safe, trusted, and professional platform, and LinkedIn strictly enforces them. They explain in clear detail all of the categories of abusive content that are not allowed on LinkedIn. This includes the types of content contemplated by the Consultation, including hate speech, harassment, bullying, violent, explicit, graphic, sexual, and all other forms of content that have the potential to harm LinkedIn users. Specifically, our policies prohibit content expressing or promoting misogynistic ideas or behaviors, including through the normalisation of sexual violence, online harassment including but not limited to pile-ons, online abuse including but not limited to domestic abuse, and image-based sexual abuse including but not limited to intimate image abuse and cyberflashing. LinkedIn employs a robust and nuanced enforcement system to strictly enforce these policies for the protection of all users.

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**II. Protections Should Not Be One-Size-Fits-All**

The Guidance expresses recognition that different service providers will have different risk levels, user bases, and designs, and LinkedIn is pleased to see such recognition. However, LinkedIn requests that the implied consequence be laid out more explicitly in the Guidance: the conclusion that service providers should use their discretion to determine which solutions will be most relevant for them and only implement the steps that are appropriate for their service. Specifically, paragraph 2.20 of the Consultation Document speaks directly to this point, but there is no matching statement within the Guidance itself. LinkedIn requests that this clear statement, communicating that appropriate protections will vary between services and that services should use their discretion on which steps to implement, be included within the final Guidance document.

LinkedIn's robust protections are the result of years of careful development and iteration and are uniquely tailored to protect against potential harms on LinkedIn. Any generic list of protections crafted without LinkedIn in mind would necessarily fall short of the bespoke system created with intimate knowledge of the risks and use cases of the particular platform. Moreover, enforcing a rigid, one-size-fits-all approach could undermine the nuanced strategies already in place on platforms like LinkedIn, where multidimensional moderation is tailored to diverse platform-specific user interactions and risks. Rather than prescribe a universal solution, the Guidance should empower platforms to innovate and refine their protective measures without imposing structures that may not ultimately reduce harm and abuse or align with platforms' unique goals and capabilities.

As an example, one of the categories of harm addressed in the Guidance, "online domestic abuse," presents a significant enforcement challenge given its need for off-platform context relating to the relationship between the abuser and the victim. LinkedIn's existing policies cover such harms more broadly by prohibiting all content that seeks to intimidate, harass or attack members on the platform – regardless of the victim's relationship with the abuser. By addressing such harmful content wholesale, LinkedIn need not impose unnecessary restrictions or burdens on users reporting harmful content. If LinkedIn were obliged to offer reporting for this specific harm, users wishing to report content that would already be swiftly actioned under one of LinkedIn's existing policies would instead be presented with a confusing choice between different policy reporting flows; and those selecting "online domestic abuse" would have to clarify the necessary off-platform context – presenting the most-vulnerable users with burden, delay, and confusion that are unnecessary to combat content that is otherwise already covered under LinkedIn's existing policies against harassment and abuse.

**III. Guidance Should Present a Holistic Framework, not a Checklist**

While LinkedIn recognizes that certain groups may be particularly vulnerable, the Guidance should not direct all platforms to treat a subset of their userbase differently if the platform is already applying robust and adequate protections universally. LinkedIn's policies seek to protect every user of the LinkedIn platform (as well as anyone else impacted by user content on the platform), and violations of our Professional Community Policies are treated equally, regardless of the identity of the violator or the individual harmed. Rather than presenting a checklist of risk

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mitigations that services providers are instructed to follow to protect a subset of a service's userbase, the Guidance should be framed as presenting a holistic framework that clarifies the types of protections that may help protect the identified class, without dictating a specific checklist of behaviors that each platform must follow.

LinkedIn is pleased that Ofcom, in its Consultation Document, has expressed its intention to treat the Guidance as a set of recommendations, allowing platforms the discretion to determine which steps are appropriate for their offerings. This statement suggests that Ofcom might view the Guidance as a lens through which to assess services' safety measures, rather than prescribing a set of targeted mitigations. However, LinkedIn requests that this approach be made clearer in the text of the Guidance itself. Such an approach facilitates continuous improvement, ensuring protections remain relevant and robust in the face of changing technological landscapes and user behaviors.

The Guidance observes that different services will have different risk profiles and will need to take unique risk mitigation approaches tailored to their particular use cases. It is crucial that platforms remain agile, not only adapting to changing risks but also proactively identifying emerging vulnerabilities. This dynamic approach aligns with the broader goal of creating a safer online environment without compromising innovation or diversity in platform functionality. The good practice steps and case studies outlined in the Guidance offer useful direction on further steps that may – or may not – be appropriate for any particular service; however, these steps should be tailored to the unique risk profiles and operational structures of different services.

This recommendation that the Guidance be framed as presenting a holistic approach applies as well to the assessment Ofcom intends to release after one year; the unique position of each platform should not be forgotten when publishing the proposed assessment.

**IV. Guidance Should Provide Clarity on Relationship with Illegal Content Codes of Practice**

The Guidance acknowledges that the Foundational and Good Practice Steps overlap considerably with the Illegal Content Codes of Practice already in force. For the avoidance of doubt, the Guidance should explicitly clarify that compliance with the Illegal Content Codes serves equally as implementation of the Foundational and Good Practice Steps in the Guidance. For instance, it should be clarified that if a service is already conducting an annual risk assessment in accordance with the Illegal Content Codes that covers the types of harms addressed in the Guidance, a separate risk assessment is not needed to assess the risks on the platform related to women and girls specifically. This goes hand-in-hand with the recommendation discussed above, that the Guidance serve as a holistic framework rather than a list of prescribed steps.

**V. Invitation for Continued Dialogue**

LinkedIn appreciates the opportunity to be part of this consultation and emphasizes its commitment to fostering a safe and trusted online ecosystem. LinkedIn stands ready to engage further and contribute its insights to ensure the Guidance reflects the nuanced realities of platforms and their user bases.