

## **Match Group submission - Draft Guidance on a safer life online for women and girls**

Consultation on draft Guidance: A safer life online for women and girls

Question 1: Do you have any comments on our proposed approach to ‘content and activity’ which ‘disproportionately affects women and girls’?

Match Group is committed to maintaining the highest online safety standards across our portfolio of apps. We recognise the scale of ‘content and activity’ which ‘disproportionately affects women and girls’ online and treat these issues with the utmost seriousness they deserve.

We view these issues – and creating a safe online experience for women on our platforms – as existential for our business. Trust and Safety are core to our ability to attract, retain and protect our users, especially women. Building safe environments is critical to sustaining user trust and platform success and longevity. Match Group takes a zero-tolerance approach against gender-based violence. To reiterate, our platforms are strictly 18+, and we are committed to preventing and tackling violence against women across our platforms.

We are glad to see Ofcom is focusing on these vital issues as it implements the UK’s landmark online safety regime. We agree with Ofcom’s approach to narrow the draft Guidance to areas where women and girls experience a disproportionate and distinct harm, as well as areas where the primary impact of the content or activity is to reinforce, enact or enable misogyny, sexism or other forms of gender-based violence or abuse.

We support Ofcom’s approach and welcome the additional guidance which sets out how providers can act against harmful content and activity that disproportionately affects women and girls, in recognition of the unique risks they face.

Match Group welcomes the overarching proposals and proposed actions outlined in this consultation which align with our existing approach to preventing and tackling harmful content and activity that disproportionately affects women and girls. We recognise that some of these proposals are not applicable to all services, and this is dependent on a range of factors including the online services’ nature, intention and target audience, its design, and its specific risk-profile.

As we have comprehensively outlined in various previous consultation responses, Match Group adopts robust trust and safety measures and processes, which contribute to the prevention and tackling of gender-based harms. We have extensive policies and content moderation procedures in place to manage harms, particularly harms focused on women and girls. While our platforms are already complying with many regulatory requirements across the globe, we are proud that many of our most impactful features

and policies—such as our industry-leading restrictions on image sharing and our handling of reports of off-platform misconduct—go well beyond legal obligations.

In addition, Match Group employs leading safety-by-design practices to ensure our services are built to be resilient to online harms, including gender-based harms. Our safety-by-design approach reduces the potential avenues for harm and is integral to our online safety efforts. A comprehensive set of policies detail relevant definitions and guide our approach to gender-based violence across our platforms, which includes:

- **Violence and hate policies** – including hateful and discriminatory behaviour and threats and wishes of harms.
- **Abuse and harassment policies** – including a specific policy on non-consensual sharing of private information, including Non-Consensual Intimate Image (NCII). This covers impersonation and off-platform harassment.
- **Adult nudity, pornography, and sexual content** – Users cannot share images that include adult nudity, including NCII.

As outlined, no Match Group platform available in the UK allows the private exchange of images, nearly entirely eliminating the incidence of NCII distribution on our apps. In addition, we use a range of highly effective automated systems to detect and take action against nudity, supported by additional reviews by human moderators.

Furthermore, we recognise our responsibilities to address VAWG extend beyond in-app interactions. Our policies relating to allegations of offsite misconduct are our most stringent, and we take action on credible reports of off-platform misconduct, violence, harm, coercion, or exploitation. When we take action under these policies, users are permanently banned. We operate a ‘circulated enforcement’ policy, meaning that if a user commits an offence relating to gender-based violence on one Match Group platform, they are subsequently banned from all Match Group platforms.

We also recognise that gender-based violence is not experienced uniformly. Our safety approach is informed by the understanding that factors such as race, sexuality, disability, and age can intersect to shape users’ experiences of harm. To this end, Match Group is proud to operate a collaborative model, working with organisations across the globe to understand and prevent gender-based violence and continually refine and adapt our efforts to tackle these issues. Our partnerships with NGOs are central to our trust and safety efforts. We have relationships with more than 100 organisations in over 20 countries worldwide to address critical issues both on and off our platforms, including gender-based violence.

We work with a range of partner organisations to contribute to prevention, education, and victim support, as well as driving culture change to reduce VAWG across society. Match Group has a long history of working in partnership with women-focused

organisations including the National Sexual Violence Resource Center, Solidarité Femmes, RAINN and NO MORE, amongst others, to raise awareness of Match Group's focus and efforts to prevent sexual assault, sex trafficking, abuse, harassment, and similar issues.

For example, in 2023 and 2024, Match Group launched [Healthy Dating Guides](#) in partnership with [NO MORE](#) across 10 countries - including the UK - on Tinder, Hinge, and Meetic. Using data-driven insights from Match Group and NO MORE, we collaboratively developed the content of the guides, which provide actionable steps and considerations for every stage of the dating journey. Users clicked on the guides more than 2 million times across Tinder, Hinge, Meetic and OurTime in the first days of the campaign and there have been nearly 400,000 views of the guides on NO MORE's website to date. Match Group will continue to collaborate with UK partners to jointly deliver safety campaigns. A recent example is our partnership with NO MORE in October 2024, where we launched a pop up nail bar offering '[Ten Tips](#)' for empowered and positive dating – a testament to our ongoing commitment to impactful safety initiatives.

Alongside this, the Match Group Advisory Council (MGAC) plays an important role in our approach to these issues. Founded in 2018, the MGAC is a group of globally recognised NGO experts specialising in various issues including gender-based violence. We are proud to work closely with leading NGOs, experts and advocates involved in the study and prevention of sexual assault, sex trafficking, abuse, harassment, and similar issues.

MGAC members are a critical component of our safety-by-design process, convening with us regularly to shape our policies, features, and user education initiatives, and ensuring that our platforms remain safe, inclusive, and innovative. The MGAC has influenced industry-leading features such as Tinder's 'Share My Date', reflecting its importance to our approach.

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

Match Group welcomes the nine proposed actions which address the key and interlinked areas of taking responsibility, preventing harms and supporting women and girls to improve their online safety. We are proud to already be implementing many of the nine proposed actions (where appropriate) outlined in this guidance across our platforms. Our response focuses on some of the relevant actions where we believe Ofcom would most benefit from Match Group's input and expertise.

Action 4: Conduct abusability evaluations and product testing

Match Group supports this proposed action and the commitment to conducting abusability evaluations and product testing, including using red teaming to identify

ways malicious actors may try to use service features to perpetrate harm. As Ofcom rightly recognises, this is a vitally important method to help services identify how malicious actors could exploit a service, feature or functionality.

Our safety-by-design processes ensure we embed trust and safety analysts at the beginning of the product development process. We already use red teaming, particularly as part of our responsible AI approach. We firmly believe the best solutions and safeguards result from product teams adopting a critical approach towards their own products.

For example, during the development of [Tinder's the Game Game](#), Match Group developed a comprehensive responsible AI risk assessment, which identified the strengths and main risks in the feature design and model output. This helped us develop internal recommendations to improve the feature, including recommendations to make it more inclusive and accessible and to improve the experience for women using it. Throughout the development process, we also tested the guardrails with the AI bot and systemically tested it against various policy areas, including its approach to dealing with gender-related issues and misogyny, and similar issues which may apply to vulnerable groups. In addition, we adopted personas to again test the guardrails of this feature and tested its response against our content policies. This reflects the importance of rigorous product testing to ensure new and innovative features continue to adhere to the highest online safety standards.

#### Action 6: Reduce the circulation of online gender-based harms

Match Group is proud to lead the industry in our efforts to reduce the circulation of online gender-based harms. As Ofcom is aware, we already adopt the good practice step identified in this consultation, as many of our services implement 'frictions' through nudges (design measures within an online environment to promote some behaviours and/or discourage others).

For example, our 'Are You Sure?' feature encourages a change in behaviour, aiming to prevent harm from occurring in the first place. These prompts were sent 250,000,000 times on Tinder in H1 2024. Users who received a prompt changed their behaviour 17% of the time.

While it is important to ensure the user reporting process is simple and victim-informed, addressing widespread underreporting of harm is also vital to improve online safety for women and girls. Nudge systems such as Tinder's 'Does This Bother You?' are focussed on encouraging greater reporting, and showed prompts to more than 160,000,000 users in 2024.

We are increasingly shifting to effective machine learning and AI tools and processes to activate prompts, as our experience shows simple key word detection may not completely identify and address potentially harmful behaviours.

#### Action 7: Give users better control over their experiences

We also welcome the overarching proposal to give users better control over their experiences. In relation to allowing users to filter out content from users without identity verification, this is something we are increasingly exploring across our platforms.

Our photo verification feature helps users confirm that they are the person in their profile by comparing their profile photos with a short video selfie that will be compared to their profile photo. On Tinder in various countries (including the UK), users now have the option to complete both Photo Verification and ID Verification, which checks their date of birth and their ID photo likeness on their Profile page.

This feature helps promote trust on our platforms and reassures users that the person they are speaking to is genuine, enhancing the safety of their dating experience. While uptake of these optional ID features is relatively low across our platforms, we are continuing to pursue this as we think it is an important measure, and we encourage other platforms to do the same.

#### Action 8: Enable users who experience online gender-based harm to make reports

Match Group welcomes Action 8 and supports Ofcom's efforts to strengthen user reporting mechanisms for online gender-based harm. We recognise some proposed actions may not be applicable to all services, but we support the underlying goal of enabling effective, victim-centred reporting.

We believe in a trauma-informed, victim-centered approach to reports. Match has focused on making the reporting process as supportive and seamless as possible across our platforms. For example, we have invested heavily into our reporting infrastructure and awareness campaigns to ensure users know how to report and feel empowered to do so. As noted previously, we have also partnered with experts such as Hally in the EU and RAINN in the US to develop reporting tools aimed at minimising the risk of re-traumatisation.

Effective procedures for reviewing and taking action on reports is equally critical to developing easy and trauma-informed reporting procedures. That is why we have dedicated teams responsible for reviewing reports of serious harm, and have empowered those teams to provide UK-specific resources in situations where users report such harms. This helps us support those affected by VAWG throughout the entire reporting flow (including letting users know the outcome of their report).