

Your response

Introduction

Confidential - No

This is a submission by Meta Platforms Inc.

Meta Platforms Inc. welcomes the opportunity to participate in this consultation under the UK Online Safety Act (the "OSA" or the "Act") organised by the Office of Communications ("Ofcom"), calling for inputs on the consultation for a safer life online for women and girls (the "Consultation"). We also want to take this opportunity to thank Ofcom for its research as well as the industry and expert outreach for this consultation.

We share Ofcom's strong commitment to promote women and girls' safety online, as reflected in the recently published guidance. We want to make sure all our users, including women and girls, feel safe on our services and can meaningfully participate in the online community. We take a comprehensive approach to women's and girls' safety, encompassing partnerships, policies, safety tools, technology and feedback. We have large cross functional teams working on issues that promote the safety of women and girls, including a dedicated Safety Policy team and a Head of Women's Safety. We have consulted with domestic violence networks and organisations since 2009 and work with hundreds of external experts. Notably this includes the Global Women's Safety Expert Advisors, many of whom are gender based violence experts. In addition to our commitment to women's safety, we also provide protections for teens (13-17) with Instagram Teen Accounts, available in the UK since September 2024. In April 2025 we announced that Meta will start to expand Teen Accounts on Facebook and Messenger. This new account experience provides all teen users (including girls), with the most restrictive safety settings, allowing for both positive online community building, but also limiting unwanted contact and inappropriate content. Teens under 16 will need a parent's permission to change any of the restricted settings they are defaulted into. This provides an important opportunity for parents and teens to communicate better about online safety and make more responsible choices together.

As part of our longstanding commitment to all users' online safety, including women and girls, we are thankful for the opportunity to provide feedback on this draft guidance.

The guidance serves as a helpful resource in summarizing the types of content and activity affecting women and girls online, including the unique risks they face. We appreciate Ofcom providing a summary of the "foundational steps" already covered in the Codes of Practice for Illegal Harms, draft Codes of Practice for Protection of Children and draft Transparency Guidance related to protection of women and girls. We also appreciate the clear separation between the foundational steps and the nine additional voluntary good practice recommendations. However, we believe there are five areas in which the guidance could be improved for more clarity, effectiveness and proportionality, as further outlined in our responses below:

- a. Flexibility in Implementation: Considering greater flexibility for services to implement solutions that address the specific ways potential harms manifest across different products. This reflects the important differences in product design and functionalities among different services.
- b. Clarity: Ensuring that high-level objectives are clear and universally understood, rather than goals framed using academic terms and broad concepts.
- c. Offline Visibility: Understanding that services have limitations in obtaining offline information on survivors, especially on issues such as coercive control and domestic violence. The focus of the guidance should be on practical and feasible solutions for services.
- d. Privacy considerations: Emphasizing that data privacy of users is important as part of data minimization practices, meaning that content may not include personally identifiable information, including gender.
- e. Methodology and Measurement: Providing further guidance on the assessment methodology and how services are expected to engage in this process.

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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>Confidential? – Y</p> <p>See confidential annex.</p>
<p>Question 2: Do you have any comments on the nine proposed actions? Please provide evidence to support your answer.</p>	<p>Confidential? – N</p> <p>We appreciate Ofcom providing a summary of the “foundational steps” already covered in the Codes of Practice for Illegal Harms; draft Codes of Practice for Protection of Children; and draft Transparency Guidance related to protection of women and girls. Clearly separating the existing requirements from the additional voluntary nine good practice recommendations to implement, beyond these foundational steps.</p> <p>We have the following general comments on the nine proposed good practice actions.</p> <ul style="list-style-type: none"> ● “Good practice actions” on top of already very comprehensive “foundational steps”: <ul style="list-style-type: none"> ○ We note that Ofcom’s existing draft and final Codes of Practice and guidance already lay out very comprehensive measures as “foundational steps”, including for women and girls. These are comprehensive measures both in terms of their scope as well as the Codes and guidance documenting them, e.g. the Code of Practice for Protection of Children published towards the end of April covering more than 600 pages, incl. e.g. measures such as risk assessments in very regulated spaces of protection of children. ○ We understand the good practice proposed measures are connected with the “foundational steps”, in that they are meant as additional voluntary layers where the comprehensive Codes of Practice and Guidance end. While Ofcom is tasked to provide additional guidance for women and girls, and the clear split between foundational measures and good practice steps is helpful, the added nine proposed measures encompass significant additional measures where Ofcom itself sets out in this guidance that it would <u>not be able to implement some as Code measures</u> (see footnote 38 on p. 17 of the consultation:

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	<p><i>“Some of the good practice steps we recommend we may not be able to recommend as Codes. Sometimes this may be because there are legal restrictions which would prevent us from doing so - for example, we include good practice related to proactive technology (as defined in section 231 of the Act) but we would have to assess these measures against additional criteria in order to recommend these in Codes. We have not done so for the purposes of making these good practice recommendations in the draft Guidance. In addition, we can also only recommend proactive technology in our Codes on content communicated publicly – not on any content communicated privately”</i>)</p> <ul style="list-style-type: none"> ○ We also note that at times the OSA sets out a big picture of what it requires, e.g., by specifically calling out only two types of risk assessments (illegal harms and protection of children). Ofcom proposing further types of risk assessment, where the OSA deliberately just set out two, is changing the initial requirement, despite Ofcom’s duties to provide guidance. ○ As every measure not implemented by a service may be scrutinised by Ofcom and the public, especially as Ofcom will call out which measures providers implement, we suggest for proportionality to carefully assess whether each additional voluntary measure is relevant. We are recommending this as the public could interpret this as non-implementation, which could be to the detriment of a provider. We will add onto this point in our response to Question 4. <ul style="list-style-type: none"> ● Standards for voluntary measures: We appreciate that these measures are marked as voluntary, however as Ofcom will call out within one and a half years from the final guidance being issued, how providers are performing against such transparency measures, it is key that such proposed measures meet certain standards. Specifically we note: <ul style="list-style-type: none"> ○ Flexibility: Recognizing that each service is designed differently and may serve diverse users, a one-size-fits-all approach to women and girls’ safety may not account for product differences or cultural nuances. Moreover, different services may present different types of risks, depending upon factors such as functionalities, user base and design. In

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	<p>some instances, the best way to mitigate risks may be through product design and in other instances through controls, self remediation or education. Ofcom's guidance should not unintentionally restrict the ability of services to design innovative solutions, addressing specific user needs.</p> <ul style="list-style-type: none"> ○ Clarity: We appreciate the importance of developing a robust framework, but believe it's crucial to strike a balance between theory and practice, specifically on "setting out practical steps" for services. We caution that the current approach may be too theoretical in its analysis of harms and suggested approach to addressing "gendered" harms. The guidance could be strengthened by encouraging services to focus on specific, actionable policy violations, rather than veering into theoretical language that encourages services to address complex cultural and social phenomena, such as misogyny. ○ Offline Visibility: Services function with limited visibility into the offline dynamics that may lead to harm, such as coercive control or domestic violence. Guidance focused on technically feasible and scalable actions can be more effective in supporting services in their efforts to create a safer online environment. ○ Privacy Considerations: We would like Ofcom to consider that many services have large global and diverse audiences that require technically feasible and scalable solutions to address platform violations, regardless of gender. At Meta, we look at safety holistically and have experts, teams and systems in place to help us understand and address them through gender neutral platform policies. Policies, tools, resources, and outreach can take into account the online safety issues that may impact women and girls, while remaining gender neutral and relevant to all users. ○ Methodology & Measurement: The current guidance is not clear on the process and expected criteria for Ofcom's proposed assessment on how services are addressing women and girls' safety. We

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	<p>would like to request that Ofcom provides more transparency around its assessment criteria and the ways in which services are expected to engage in this process.</p> <ul style="list-style-type: none"> Draft form of Codes of Practice and Guidance. We appreciate for timing reasons this draft Guidance had to rely on draft and not final versions of, e.g., the Code of Practice for Protection of Children and Transparency Guidance. In a similar way, we note that our responses are based on the current version of this draft guidance and what is the most practical approach may change in case the final versions of Codes and Guidance change. <p>In addition, please see our comments below for individual actions:</p> <ol style="list-style-type: none"> Ensure governance and accountability processes address online gender based harms: <p>The Codes of Practice for Illegal Harms and Protection of Children already set out specific governance structures. Meta is already committed to maintaining a robust governance, risk and compliance function. This is why we question the benefit of such proposed good practice measures, and ask whether introducing additional responsibilities in overlapping fields (protection of children and protection of women and girls) may cause friction rather than add benefit.</p> <p>However in case Ofcom still seeks to include a good practice measure we recommend that Ofcom should adopt a flexible approach in considering how services can achieve this action especially as it relates to addressing online harms. Inclusive governance processes can be addressed through various means, including geographic representation, cross-functional expert teams, and stakeholder engagement mechanisms that help inform and shape key accountability processes.</p> Conduct risk assessment that focus on harms to women and girls: <p>We note the OSA only sets out two forms of risk assessment, one for illegal harms and the second is for the protection of children. As such, Ofcom's proposed good practice requiring services to conduct a risk assessment that focuses specifically on harms to women and girls, is onerous and incongruent with the aims of the OSA. Regulated services are already conducting multiple risk assessments that include or address harms to women and girls as part of their regulatory obligations.</p> <p>If despite the above, Ofcom still seeks to include such an additional good practice recommendation, rather than</p>

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	<p>mandating a one-size-fits-all structure. Ofcom should enable services to tailor their existing risk assessments to their unique operational contexts and leverage the expertise of internal and external stakeholders, including subject matter experts on various harm areas. By doing so, services can develop more effective and targeted risk assessments that address the distinct needs of their users and types of platforms.</p> <p>3. Be transparent about women and girls online safety:</p> <p>First we like to comment on <u>transparency reporting</u>: Per the OSA only “categorised” services need to provide transparency reports and from categorised services just information from a set menu of information can be requested. The menu is comprehensive, including, e.g., content moderation, and the process laid out in the draft transparency guidance already involves significant transparency efforts and various rounds of engagements. As such, Ofcom’s proposed good practices (despite their obligation to provide guidance for women and children), are significantly altering that system when they propose that every service should voluntarily issue a transparency report on the matters set out in this good practice step by Ofcom. A key principle in the OSA and Ofcom’s approach in consultations is proportionality, which also underpinned why non-categorised services were not obliged to provide transparency reports. Such a balanced approach is undermined when it is proposed that every service voluntarily provides transparency reports.</p> <p>Second we flag <u>practical considerations</u> to be taken on board for the proposed good practices:</p> <ul style="list-style-type: none"> ● There is an essential distinction to be made between data that exists and data that does not exist. As such, not only should proposals remain proportionate, but priority should be given to existing data, rather than imposing creation of new data. ● Some data may remain unavailable: <ul style="list-style-type: none"> ○ Due to the wide technical nuances and distinctions between services, we foresee a possibility that providers will be unable to fulfil some data asks where their systems do not operate in a way necessary to capture the required information. ○ Technical capabilities are governed by competing regulations, including privacy laws. Providers can face specific challenges due to privacy obligations in various jurisdictions in which they operate, including, for example, data retention limitations or sensitive data. Security concerns are top of mind when considering confidentiality or commercially sensitive information. As also set out by Ofcom, it is important to prevent bad actors from gaining more information to

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	<p>game the system. Survivor cases may also fall under the category of sensitive personal data and providers have to uphold data privacy and data minimisation obligations.</p> <ul style="list-style-type: none"> ○ Services may not be able to provide specific data about women and girls and more broadly the gender of users in relation to violations of policies. Reviewers typically only see the content of the post that may violate the policy, and as part of the review process they may not know or label the gender of the parties involved in the violation including the poster or the recipient/reporter. ● Ofcom should clarify the objective of the request while providing flexibility on how services could share metrics, allowing both Ofcom to meet its aims and services who understand their own systems to provide relevant and accurate metrics. There are a range of data specific dependencies providers such as us must consider that affect the ability to provide requested information. <p>4. Conduct abusability evaluations and product testing: We believe that Ofcom should adopt a flexible approach when guiding services through this process. Both evaluations and product testing could vary by service, product, feature etc. Being overly prescriptive may hinder innovation and stifle security and progress.</p> <p>5. Set safer defaults: Services may have additional safeguards in place for youth as part of their default settings. For adult users these features would be available as opt in. We caution against over-reliance on default features, as this may inadvertently drive adult women to seek alternative services with fewer safety measures in order to access more features. This could ultimately undermine the effectiveness of safety efforts and create unintended consequences. Therefore, we recommend that Ofcom adopt a flexible and nuanced approach when guiding services, avoiding overly prescriptive measures that may stifle innovation and limit user choice. Striking a balance between safety and user choice, we can work together to create a safer online environment, meeting diverse needs of all users, including women and girls.</p> <p>6. Reduce the circulation of content depicting, promoting or encouraging online gender-based harms: Given the diverse nature of services and their underlying technologies, we emphasize the importance of flexibility in how Ofcom guides services in designing these policies. In end-to-end encrypted (E2EE) surfaces, for example, measures to combat virality will necessarily be content-neutral, and services will place greater emphasis on robust user controls as</p>

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	<p>a way to empower and protect.</p> <p>We also stress that users have the fundamental right to engage in discourse on potentially controversial topics, as long as they do not violate platform policies. Freedom of expression is essential for fostering open and inclusive online communities. To this end, services should provide users with a range of tools and controls to shape their online experience. We urge Ofcom to adopt a flexible approach when guiding services to reduce potentially disagreeable content circulation and acknowledge the unique challenges and opportunities presented by different services and technologies.</p> <p>7. Give users better control over their experiences:</p> <p>By empowering users to manage what they share, who they share it with, what content they see and experience, and who can contact them, services can help create a safer and more tailored online environment. In addition to these fundamental controls, services can also offer a range of advanced features that enable users to shape their online experience. For example, users may be able to reset recommendations, customize their feed, report, block or mute unwanted content, and adjust their notification settings. While we recognize the importance of implementing robust online safety measures, we also emphasize the need for flexibility in how Ofcom guides services in designing these measures. The diverse nature of services and the design of underlying technologies necessitate a nuanced approach that acknowledges the unique challenges and opportunities presented by each service.</p> <p>8. Enable users who experience online gender based harms to make reports:</p> <p>Services can design accessible and effective reporting mechanisms, allowing users to report content and interactions that may violate platform policies or applicable laws. To ensure that these mechanisms are tailored to the unique needs of each platform, services should be encouraged to offer a range of reporting options that are most relevant for their specific technologies. In guiding services on this matter, Ofcom should adopt a flexible approach, recognizing that different services may require distinct solutions. Ofcom can provide clearer guidance by avoiding terms of art and by encouraging services to create reporting systems that are “accessible, navigable” and responsive to user reports of violating content.</p> <p>9. Take appropriate action when online gender based harms occur:</p> <p>Ofcom should recognize that addressing violating content is not a binary decision, but rather a nuanced and multifaceted issue that requires a spectrum of responses.</p> <p>Services have various tools at their disposal to address different types and severities of violations, and they should be</p>

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	<p>given the flexibility to choose the most effective course of action based on a variety of factors, including the context in which the content is presented (e.g., captions accompanying an image). The type of service and its design can also influence the available actions for addressing violating content, such as those available on public surfaces as distinct from end-to-end encryption (E2EE) services.</p> <p>In light of these complexities, Ofcom should adopt a flexible approach in its guidance on actions against violating content. Rather than mandating a one-size-fits-all solution, Ofcom should acknowledge the range of actions that services can take to address these issues, from deplatforming in the most severe cases to more targeted measures, such as feature restrictions or account suspensions. By allowing services to tailor their responses to the specific needs and circumstances of each situation, Ofcom can help promote a safer and more responsible online environment.</p>
<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</p> <p>Ofcom’s “good practice steps” and associated case studies for services to consider, in addition to the foundational steps, align with its vision for a safer online environment for women and girls. Many of the suggested steps are already reflected in how services design their policies and enforcement actions. As noted in the introduction, we take a comprehensive approach to women’s and girls’ safety—encompassing partnerships, policies, safety tools, technology, and feedback—to address all key aspects of safety. We believe Ofcom’s guidance is valuable in helping services understand the considerations it expects them to make. However, we suggest that Ofcom avoid being overly prescriptive, allowing services the flexibility to demonstrate good practices in ways that reflect their unique technology and the distinctive nature of their services. While we understand and support the intent behind these additional considerations—we caution Ofcom against evaluating platform effectiveness solely based on adherence to these specific good practices.</p> <p>Further we have identified specific good practice steps we have additional comments on for Ofcom’s consideration:</p> <p><u>Action 1B: Considering intersectionality: Ensuring that governance and decision-making processes consider intersectionality of online harms, or how people with multiple characteristics, including gender, race or disability, experience disproportionate risks on services. This understanding can help inform governance and decision-making processes by avoiding different types of harm being addressed in isolation.</u></p> <p>Services may lack the nuanced and detailed context necessary to know about the potential intersecting parts of a user’s</p>

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	<p>experience. Despite not knowing about intersecting experiences, services can provide tools to give users control of their online experiences and take action against individual acts that violate their policies. Additionally, services can promote external resources that support victims/survivors, including crisis lines and other vital services. However, beyond actions that explicitly violate platform policies, services are limited in their ability to see all aspects of a user's offline identity.</p> <p><u>Action 2: Conduct risk assessment that focus on harms to women and girls</u></p> <p>We refer to our response to Question #2 regarding risk assessments</p> <p><u>Action 2A: Engaging with survivors and victims to better understand their experiences. However, this type of engagement can put a burden on survivors and victims, as well as organisations that support them. Engaging with organisations that represent people with lived experience can be valuable, particularly when these organisations include individuals with lived experience as well. As these organisations are often under-resourced, service providers could consider appropriate compensation for any work dedicated to improving provider's policies or risk assessments.</u></p> <p>Since it is not always safe or appropriate to engage directly with survivors and victims, we encourage Ofcom to change the focus of this to engage with organizations that support survivors and victims. We do think there are situations where engaging with survivors and victims is appropriate but this should be done carefully and with the support of experts.</p> <p><u>Action 2C: Conducting an impact assessment alongside other risk assessments to assess impacts on self-expression, freedom from discrimination and privacy, especially for those with protected characteristics</u></p> <p>We refer to our response to Question #2.</p> <p><u>Action 3: Be transparent about women and girls safety online</u></p> <p>We refer to our response to Question #2.</p> <p><u>Action 3A. Sharing information about the prevalence of different forms of online gender-based harms and the effectiveness of measures in place to address them, where</u></p>

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	<p><u>that data is already available to providers and is collected and managed in line with data protection regulations. This information could include data on user reports and their outcomes, as well as gender-disaggregated and race-disaggregated data on reports and outcomes. 125 It could also reveal additional information on which harms disproportionately affect women and girls, as well as indicate any biases in how reports are dealt with.</u></p> <p>We refer to our response to Question #2.</p> <p><u>Action 9:Take appropriate action when online gender based harms occur</u></p> <p>We refer to our response to Question #2.</p> <p><u>9C. Watermarks and metadata: Adding watermarks and metadata to content can indicate where content is synthetic and how it has been edited or manipulated. This can also be a useful tool for sex workers and adult content creators whose intimate images have been re-shared without their consent.</u></p> <p>Applying watermarks and metadata to content can be a valuable tool in indicating when an image or video has been edited or manipulated. Ofcom should encourage technologies and services with similar capabilities to develop synthetic content to follow industry best practices, as it may not always be feasible for services to determine whether content has been manipulated outside of their own ecosystems.</p> <p>In addition to watermarks and metadata, hashing technology is another effective method that can be used across the industry to further protect users from intimate image abuse. By promoting the adoption of these technologies, Ofcom can help create a safer online environment for all users.</p> <p>Moreover, we believe that Ofcom can play a crucial role in emphasizing the importance of cross-industry collaborations and signal sharing in making services safer for users. By fostering partnerships between different stakeholders, including services , and advocacy groups, Ofcom can help facilitate the development of innovative solutions to address emerging challenges and promote a culture of safety and responsibility online.</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</p>	<p>Confidential? – N</p> <p>We appreciate the important role that Ofcom plays in being tasked to draft the guidance for protection of women and girls and furthering women and girls online safety. We are grateful for Ofcom providing a clear timeline to publish the final guidance by the end of 2025 and collaborating with providers.</p>

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<p>encourage providers to take up the 'good practice' recommendations?</p>	<p>We note it would be very helpful for providers if Ofcom can, in its final guidance, include a table which sets out the "foundational steps" - as updated with the most recent final Codes of Practice (eg the Final one for Protection of Children) and Guidance (e.g. the final one for transparency) - and separately also any good practice steps Ofcom will include upon reviewing stakeholder feedback.</p> <p>We understand Ofcom seeking to check where providers stand on the voluntary good practice steps, one and a half years after the final guidance is published. For our feedback on the proposed good practice steps, we refer to our responses above. The following feedback is focused on the proposal to publish an assessment on how providers are addressing such proposed voluntary good practices.</p> <p>We want to reiterate that services will have different perspectives and may approach safety and solutions in unique ways, while still meeting the spirit and overall objectives of the guidance. To accommodate this reality, we believe it is essential to allow services the <u>flexibility</u> to design their own approaches to addressing user safety, rather than imposing an overly prescriptive set of practices.</p> <p>On Ofcom's proposal to publish an assessment of how services are addressing women and girls safety, we understand that Ofcom is committed to promoting best practices and encouraging innovation, and we would like to respectfully suggest that Ofcom be more transparent around its process and criteria around how it plans to do this. Ofcom should provide <u>further guidance</u> on the assessment methodology and the ways in which services are expected to engage in this process.</p> <p>Specifically it would be helpful for services to learn:</p> <ol style="list-style-type: none"> 1. What kind of insights is Ofcom gathering to inform this assessment? 2. When will Ofcom gather such insights, as we understand e.g. transparency notices are sent to providers at different times, so where e.g. a proposed good practice includes suggesting including additional transparency information in transparency reports it may depend on when the provider received the transparency notice whether he has already had an opportunity to include such information. 3. What measures does Ofcom apply to ensure comparability where services are set up technically different, e.g. some services being encrypted? 4. Does Ofcom plan to grade services, and if so what will be the breakdown of this grading criteria? 5. Will services be allowed to see the criteria and assessment before it is published? We strongly recommend this.

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	<p>6. Will services be graded on the “good practice steps” or the “foundational steps”? It should also be considered and communicated that the “foundational steps” are very comprehensive” and the good practice steps are voluntary.</p> <p>7. Is grading going to be an average overall or will services be graded on each of the nine actions that Ofcom has laid out?</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</p> <p>We have no comment on this.</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? – N</p> <p>We have no comment on this.</p>

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