

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>While obliged by law to identify content and activity which disproportionately affects only 51% of the population there is no legal mandate to adopt a gendered approach to describing that content and activity.</p> <p>Your repeated use of the term Misogyny instead of referencing gender based hatred, contempt or prejudice immediately excludes a minority group in the UK: men. Men also suffer extensive gender based hatred, contempt and prejudice, online and offline, with material and severe impacts to their lives and wellbeing – cf. Male suicide rates, discrimination against men in recruitment, etc. Female MPs bemoan the online abuse they receive yet none of them have had anywhere near the abuse received by Nigel Farage and Boris Johnson, one of whom has been physically assaulted on multiple occasions, no doubt due to lies and constant online attacks against him creating a public perception that physical violence is justified.</p> <p>By articulating a gendered approach to defining content and activity you expose this guidance and any attempted enforcement to legal claims under the Equality Act 2010.</p> <p>Separately your approach is rife with the discredited, divisive and unhelpful use of 'intersectionality'. While beloved by gender studies students and the grievance industry this is itself in breach of the Equality Act 2010. An indigenous white man has the same protections under law as a disabled black lesbian refugee, something your guidance illegally seeks to deny. Indeed, as a non-binary physically disabled refugee immigrant of colour with a learning disability I would be horrified at receiving 'special' treatment because of those attributes.</p> <p>Finally section 2.22 references online violence. Get a grip, words are not violence. Pretending otherwise creates a perception that physical violence is an appropriate response (cf. The assaults on Farage).</p>

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<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>Actions 2 and 3 both provide gender specific responses where gender neutral ones would be equally applicable and assure that protections are afforded to everybody online, not just the privileged 51%.</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>You appear to be encouraging burdensome heavyweight hard to manage processes in which fairness will be near impossible, and the rights to freedom of expression will be lost.</p> <p>I reject this.</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</p> <p>Why wouldn't you publish an assessment of how providers are addressing online safety, irrespective of gender? The continual exclusion of 49% of the population is a far greater harm than the impacts on any individual.</p> <p>You could encourage providers to take up the good practice recommendations – many of which are sensible and appropriate – by making it easy for them to do so, and without requiring them to illegal discriminate based on gender.</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? – Y / N</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 dis-</p>	<p>Confidential? – N</p> <p>I found no reference in the guidance to using Welsh. I would also reject any requirement to support people wishing to use Welsh; service providers must be a liberty</p>

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agree, 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.	to choose the languages in which they wish to provide their service, and if they feel unable to appropriately monitor and review user content in other languages, reject that user content.

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