

# Consultation response form

## Your response

Question	Your response
<p><b>Question 1:</b> 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>I would reframe the four categories slightly:</p> <ol style="list-style-type: none"><li>1. Misogyny including manosphere; games chat rooms; porn sites and chat rooms</li><li>2. Online harassment and abuse (incl. pile ons, stalking, doxing, honor based abuse)</li><li>3. IIA and cyberflashing – and crucially highlight here generative AI; and open advertising (on google, apple etc.) for nudify apps, deepfake porn etc</li><li>4. Technology for coercive control. It's not coercive control by intimate partners and not just domestic abuse. Stalking enabled by tech (stealth software, smart plugs etc.); plus use of apps for domestic appliances (heating, lighting, doorbell cameras) for control. Need greater awareness of this and that controlling use of this is a form of abuse.</li></ol>
<p><b>Question 2:</b> Do you have any comments on the nine proposed actions? Please provide evidence to support your answer.</p>	<p>Confidential? – N</p> <p>More on signposting support to survivors. The emphasis is all on prevention (incl. supporting users with how to block certain content) but nothing signposting victims of abuse and TFGBV to support mechanisms. We know severe mental health impacts of online violence including isolation.</p>

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	<p>More on advertising responsibilities and hosting of apps : google, apple etc. shouldn't be enabling access to nudity apps, deepfake apps. Etc. And there should be much greater awareness campaigning. Huge risks of honour based abuse from deepfakes.</p> <p>Early access to violent porn – platforms need to take more responsibility on age verification.</p>
<p><b>Question 3:</b> 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>Could you bring out intersectional risks more? And risks for LGB groups</p>
<p><b>Question 4:</b> 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? – Y / N</p>
<p><b>Question 5:</b> 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>Impact assessment should specifically include young people – so identifying how / whether initiatives have influenced behaviour of young men and boys.</p> <p>Also assessment across 4 nations; and rural / urban differentiation.</p>
<p><b>Question 6:</b> Do you agree that our draft Guidance is likely to have positive effects on opportunities to use</p>	<p>Confidential? – N</p> <p>Has any assessment been made of reach to gaelic speaking areas e.g. Scottish islands?</p>

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<p>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>Also language as a factor in some ethnic groups especially refugees, asylum seekers and new arrivals?</p>

Please complete this form in full and return to [OS-Section54@ofcom.org.uk](mailto:OS-Section54@ofcom.org.uk).