



# 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>The Advisory Committee for Scotland (ACS) advises Ofcom about the interests and opinions, in relation to communications matters, of persons living in Scotland. The response from the ACS to this consultation draws on the knowledge and expertise of ACS members and is informed by our individual experience and through discussion at our meetings. It does not represent the views of Ofcom or its staff.</p> <p>In our response to this consultation, we would like to reiterate our advisory remit, as it extends to Scotland, and we will therefore concentrate on those areas that we believe are of particular interest and importance to Scottish consumers. We have set out our rationale and suggested additions/amendments to the guidance below.</p> <p><u>Four harms:</u></p> <p>Regarding Ofcom's proposed approach to content and activity which disproportionately affects women and girls, the guidance focuses on four harms: online misogyny, pile-ons &amp; online harassment, online domestic abuse and image-based sexual abuse (and excludes harms already covered by other statements and proposals, e.g. human trafficking). We would additionally highlight abuses such as doxing and honour based abuse, but appreciate that these are included within the body of the document.</p> <ul style="list-style-type: none"><li>➤ We would also add financial abuse to the list of harms (see Scotland's Strategy for Preventing and Eradicating Violence Against Women and Girls<sup>1</sup>).</li></ul> <p><u>Scope of technology impact:</u></p>

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	<p>We understand the rationale in para 2.4. to efficiently focus the guidance where “<i>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</i>”. However, user-to-user and search services are, for many, a gateway to news, education, jobs, shopping, advice, information, relationships and opportunities to improve quality of life. The hidden burden of household and family management (which primarily falls to women) is now managed via technology<sup>2</sup>. Digital apps increasingly act as the ‘front door’ to public services, supporting democratic engagement and access to local news and urgent issues. It is therefore likely that these technologies amplify not only issues of misogyny and violence, but also the wider social inequalities experienced by women and girls (e.g. health inequalities<sup>3</sup>). We note that women are less likely to visit online news services than men<sup>4</sup>, feel less confident with emerging technologies such as generative AI<sup>1</sup> and there is a widening gender gap re digital skills for work.<sup>5</sup></p> <ul style="list-style-type: none"> <li>➤ Broadening the focus of the good practice guidance in future could provide an opportunity to address such inequalities through a wider, preventive lens.</li> </ul>
<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>We support the nine proposed actions and also suggest the guidance could go further.</p> <p><u>Prevalence and rights:</u></p> <ul style="list-style-type: none"> <li>• 1 in 3 women in Scotland aged 16-34 have experienced online violence. Women and girls in Scotland are more likely to experience sexually explicit online violence than the other UK nations.<sup>3</sup></li> <li>• Most people in Scotland are not confident that they know their online rights in situations of online violence and harassment.<sup>6</sup></li> <li>• The Many Good Men theatre project reports that young women perceived that ‘pornography makes young men feel entitled to sex and particular kinds of ‘kinks’. They said that the young men they know will see young women as weird or odd if they express the view that violence in sex is wrong. “<i>Hitting a woman is not a kink</i>”, said one young woman’.<sup>6</sup></li> </ul>

<sup>2</sup> [Digital overload: Why women are doing a hidden form of work - BBC Future](#)

<sup>3</sup> <https://www.gov.scot/publications/womens-experiences-discrimination-impact-health/>

<sup>4</sup> <https://www.ofcom.org.uk/media-use-and-attitudes/online-habits/digital-differences-between-men-and-women-revealed>

<sup>5</sup> [https://www.lloydsbank.com/assets/media/pdfs/banking\\_with\\_us/whats-happening/lb-consumer-digital-index-2024-report.pdf](https://www.lloydsbank.com/assets/media/pdfs/banking_with_us/whats-happening/lb-consumer-digital-index-2024-report.pdf)

<sup>6</sup> <https://oro.open.ac.uk/96398/1/OVAW%20N%20full%20report%20%28March%202024%29.pdf>

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	<p>Suggested additional good practice steps:</p> <ul style="list-style-type: none"> <li>➤ Platforms report relevant Scottish statistics in transparency reporting (related to Action 3).</li> <li>➤ Platforms educate users about their rights and responsibilities with regard to violence against women and girls (offline and online) and raise awareness of how apps, devices and software can be abused (related to Action 7).</li> <li>➤ The guidance on de-prioritising and de-monetising harmful content is more clearly worded to include references to violent pornography and to address chatbot design, goals and content as well as recommender algorithms. Platforms to consider all aspects of marketing and advertising to ensure that harmful content is not normalised and seen as a selling point (Action 6).</li> </ul> <p><u>Barriers to reporting and seeking support:</u></p> <ul style="list-style-type: none"> <li>• In our experience, where large platforms provide help centre links to supportive charities in the UK, some charities listed may only operate in England, with no Scottish counterparts provided.</li> <li>• Research shows that women who've experienced online violence found a detrimental impact on their mental health, but almost none sought support from their GP or healthcare services.<sup>3</sup></li> <li>• Over half of women who experience any kind of online violence report it to the platform provider (56%), but only 4% report to the police.<sup>3</sup></li> <li>• The Many Good Men theatre project found that <i>“young women kept their experiences of disturbing content to themselves, while the young men were more likely to discuss it with friends and family. This may reflect the greater stigma and victim-blaming young women face in speaking about misogynistic abuse online”</i>.<sup>7</sup></li> <li>• Offline and online violence against women and girls is rising significantly in some of Scotland's urban areas<sup>8</sup>. However, such violence is also experienced in rural populations, where additional</li> </ul>

<sup>7</sup> <https://www.zerotolerance.org.uk/resources/Many-Good-Men.pdf>

<sup>8</sup> <https://news.stv.tv/west-central/violence-against-women-a-growing-city-wide-issue-in-glasgow-campaigners-warn>

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	<p>barriers present, such as avoiding reporting due to local stigma, and difficulties accessing appropriate support services.<sup>9</sup></p> <p>Suggested additional good practice steps:</p> <ul style="list-style-type: none"> <li>➤ Platforms signpost users towards Scottish sources of support and encourage take-up of local support services (Action 8).</li> <li>➤ Platforms consider how to harness their relationship with consumers beyond signposting e.g. how they can provide further support and services to a user who reports an incident to them and does not engage with or have easy access to appropriate public or third sector services (Action 8).</li> </ul> <p><u>The role of apps:</u></p> <ul style="list-style-type: none"> <li>• Powerful, influential apps have become integrated into daily life for many people (e.g. UK adults spend an average 47 minutes a day on YouTube<sup>10</sup> and usage begins at a young age: over 80% of UK 3-5 year olds use YouTube<sup>11</sup>). How could these familiar apps be further utilised for the public service goal of protecting women and girls?</li> </ul> <p>Suggested additional good practice steps:</p> <ul style="list-style-type: none"> <li>➤ Platforms consider how they can go further to address the safety of women and girls in Scotland e.g. funding research into gender based violence reduction, rolling out public awareness campaigns, or commissioning programmes to support women’s financial independence skills. Such programmes could be sensitively targeted to populations more at risk.</li> </ul>
<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</p>	<p>Confidential? – N</p> <p>No additional comments.</p>

<sup>9</sup> [https://swgfl.org.uk/assets/documents/remote-realities-exploring-online-harm-and-abuse-in-the-context-of-rural-scottish-women.pdf?\\_id=1718267620](https://swgfl.org.uk/assets/documents/remote-realities-exploring-online-harm-and-abuse-in-the-context-of-rural-scottish-women.pdf?_id=1718267620)

<sup>10</sup> <https://www.ofcom.org.uk/siteassets/resources/documents/research-and-data/online-research/online-nation/2024/online-nation-2024-report.pdf>

<sup>11</sup> <https://www.ofcom.org.uk/siteassets/resources/documents/research-and-data/media-literacy-research/children/childrens-media-use-and-attitudes-report-2025/childrens-media-literacy-report-2025.pdf>

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<p>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>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>No additional comments.</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 encourage the use of a Child Rights and Wellbeing Impact Assessment<sup>12</sup> and preventative spend/cost-benefit analysis.</p>
<p><b>Question 6:</b> 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</p>	<p>Confidential? – N</p> <p>We do not feel we are in a position to comment on this issue. However, it does raise the question around how accessible the guidance is to speakers of Gaelic and other languages across Scotland and the wider UK.</p>

<sup>12</sup> <https://www.gov.scot/publications/child-rights-wellbeing-impact-assessment-external-guidance-templates/>

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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.	

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