



# Consultation response form

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## 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>We welcome Ofcom's assessment of the content and activity that disproportionately affects women and girls because of the "harmful ways online services are used to control, exploit, monitor, silence, humiliate, abuse, and threaten women and girls because of their gender" (Paragraph 1.8). Our 2024 report, <i>The State of Girls' Rights in the UK</i><sup>1</sup>, in which we spoke to over 3,000 girls and young women across the UK, found that girls and young women value feeling connected and part of their community, whether in-person or online – and these are important sources of joy in their lives. But it's double-edged where girls are also feeling unsafe online. <b>Only 9% of girls and young women we spoke to say they feel completely safe online.</b></p> <p>Additionally, we welcome recognition of the additional harms that those with multiple and intersecting protected characteristics might face (Paragraph 1.8). <b>Online harms faced by girls is not a homogenous experience but parallels the differentiated and intersecting forms of abuse and discrimination girls also face in offline settings.</b> It is not only sexism that determines girls' experiences online. Racism is also a driver of harassment, as is identifying as LGBTQ+ or having a disability. Our <i>State of Girls' Rights in the UK 2024</i> report found that girls with multiple and intersecting protected characteristics responded differently to how happy they feel with the online world. Our research found:</p> <ul style="list-style-type: none"><li>• A disproportionate number of young carers are unhappy with their online life (17% are unhappy) along with those who suffer from a mental health condition, and neurodivergent girls and young women (both 16%) compared to 7% of those girls and young women who did not identify with any of these groups.</li></ul>

<sup>1</sup> Plan International UK (2024) *The State of Girls' Rights in the UK 2024*, available online at: <https://plan-girls-rights>.

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	<ul style="list-style-type: none"> <li>• Similar numbers of disabled girls and those who identify as LGBTQ+ also struggle with exposure to negativity in the online world (both 15%)</li> <li>• Girls and young women of colour (13%), those from single parent households (14%) and those living in areas of high deprivation (11%) are also marginally more likely to feel unhappy about their online life.</li> </ul> <p><i>“It is when the two come together, racism and sexual harassment, it is just so massive, it is two things that you would hope would not collide, but they have collided, it is almost a niche problem, yet it isn’t because it is so widespread” – Saanvi, age 19<sup>2</sup>.</i></p> <p>The inclusion of intersectionality at the outset of this draft guidance is therefore welcomed and <b>we encourage this intersectional approach to be embedded across each chapter in the “Good practice” sections</b> (similar to paragraph 4.20c, 3.13b). This would serve as a continued reminder for tech companies to consider the additional risks that certain groups of women and girls might face.</p> <p>We also welcome and agree with the four overlapping forms of harm that are covered within the draft guidance (paragraph 1.10), and particularly note:</p> <p><b>1) Online misogyny</b></p> <p>We agree with Ofcom’s inclusion of research highlighting the worrying trend that boys are viewing more content from misogynistic influencers (paragraph 2.11). Girls across the UK have told us that they are concerned by the rise of the “manosphere”, a cluster of online communities “united in their hate-filled views on women and girls” which promote a “hypermasculine sexuality that is intrusive or aggressive”<sup>3</sup>.</p> <p><i>“Sexism is still prevalent – if not getting worse – with social media trying to make men masculine again. It is a breeding ground for hate against women that young boys can read” – Survey participant, aged 20, Yorkshire and Humberside<sup>4</sup></i></p>

<sup>2</sup> Plan International UK (2022) “Everything is Racialised on top”: Black and minoritised girls’ and young women’s experiences of public sexual harassment in the UK. Available at: <https://plan-uk.org/sites/default/files/2023-05/Everything%20is%20Racialised%20Report.pdf>

<sup>3</sup> Rothermel, A.K. (2023) The role of evidence-based misogyny in antifeminist online communities of the ‘manosphere’. *Big Data & Society*, 10(1). <https://doi.org/10.1177/20539517221145671>

<sup>4</sup> Plan International UK (2024) The State of Girls’ Rights in the UK 2024, available online at: <https://plan-uk.org/state-of-girls-rights>.

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	<p><i>“It is interesting how well organised the misogynistic community is. There are often death and rape threats to women and politicians, and to people who call them out. It makes people scared to oppose it” – Focus Group Participant<sup>5</sup></i></p> <p>We know that boys and young men, particularly those who may be in vulnerable situations, may be targets for this content, and that sites such as YouTube and TikTok have powerful algorithms that can show these videos to children and young people who have never before been exposed to these themes<sup>6,7,8</sup>. In 2024, Plan International UK commissioned research into the issues affecting young people around gender-based violence. This involved a series of focus group discussions with 28 young people from Plan International UK’s Youth Advisory Panel, young people aged 15 to 18 from <i>Her Voice Wales</i> in the Vale of Glamorgan and 14- to 15-year-old boys that attend Greenhill School in Tenby.<sup>9</sup></p> <p>Young people spoke about “being manipulated online” through social media. In a mixed-sex focus group discussion, one boy explained:</p> <p><i>“It is so easy to access dark stuff, violent porn etc online. We are seeing the impact of that”</i>. Another participant went on to say: <i>“boys don’t understand how harmful some of the stuff they’re watching is”</i>.</p> <p>In one of the boys-only focus group discussions, boys agreed that <i>“government should stop algorithms targeting young boys so they can enjoy time online, without having to defend themselves from this stuff”</i>.</p>

<sup>5</sup> Unpublished findings from focus group discussions conducted in 2024 that consisted of: one online mixed sex focus group discussion with 8 Plan International UK Youth Advisory Panel members, one girls’-only focus group discussion with 12 young people aged 15 to 18 years old with the organisation *Her Voice Wales* from the Vale of Glamorgan, and one boys-only focus group discussion with 8 young people aged 14 to 15 years old that attend Greenhill School in Tenby, Wales.

<sup>6</sup> The Verge (2019) YouTube may push users to more radical views over time, a new paper argues [www.theverge.com/interface/2019/8/28/208](http://www.theverge.com/interface/2019/8/28/208)

<sup>7</sup> Ribeiro, M. et al (2020). “Auditing radicalization pathways on YouTube”. Proceedings of the 2020 Conference on Fairness, Accountability, and Transparency. pp. 131– 141. doi:10.1145/3351095.3372879.

<sup>8</sup> Solea A. I., and Sugiura, L. (2023) Mainstreaming the Blackpill: Understanding the Incel Community on TikTok. *European Journal on Criminal Policy and Research*, 29, 311-336.

<sup>9</sup> Unpublished findings from focus group discussions conducted in 2024 that consisted of: one online mixed sex focus group discussion with 8 Plan International UK Youth Advisory Panel members, one girls’-only focus group discussion with 12 young people aged 15 to 18 years old with the organisation *Her Voice Wales* from the Vale of Glamorgan, and one boys-only focus group discussion with 8 young people aged 14 to 15 years old that attend Greenhill School in Tenby, Wales.

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	<p><b>We therefore suggest that the section on online misogyny (paragraphs 2.9 to 2.14) should include recognition of the role of algorithms in pushing harmful, misogynistic content, and the guidance should require companies to take proactive steps to prevent algorithms spreading such content.</b></p> <p><b>2) Pile-ons and online harassment</b></p> <p>We agree with the inclusion of <i>pile-ons and harassment</i> in the guidance (paragraphs 2.18 to 2.24), and the assessment of pile-ons as a form of harassment that affects women and girls in the public eye, and as an everyday experience for women and girls who are not in the public eye. We further welcome the inclusion of findings from Plan International’s 2020 Report, <i>Free to be Online? Girls’ and young women’s experiences of online harassment</i>, including that 58% of girls and young women surveyed had personally experienced some form of online harassment<sup>10</sup>. Four years on from this research, there has been little, if any, progress as online harassment continues to be a prevalent and widespread issue for girls and young women. A Plan International global report, published in 2024, <i>Building Digital Resilience: Girls and young women demand a safer digital future</i>, which spoke to 624 girls and young women aged 13 to 24 years old across 9 countries (not including the UK), found that <b>75% of survey participants reported having harmful online experiences at some point with almost 40% being harassed at least once a month, and 11% saying this happened daily or almost daily</b><sup>11</sup>.</p> <p><i>“Being a woman is difficult, and it is unfair how men perceive and berate women online and in person. The world is going backwards, and it is terrifying to witness”</i> – Survey participant, 20, Brighton<sup>12</sup>.</p> <p>Girls have highlighted how social media removes inhibitions, with potential for abuse to happen without consequences or revealing an abuser’s identity, creating a safe space for harassers.</p>

<sup>10</sup> Plan International (2020) State of the World’s Girls 2020: Free to Be Online? Available at: [State of the World’s Girls 2020: Free to Be Online? | Plan International](#)

<sup>11</sup> Plan International (2024) Building Digital Resilience: Girls and young women demand a safer digital future. Available at: <https://plan-international.org/publications/building-digital-resilience/>

<sup>12</sup> Plan International UK (2024) The State of Girls’ Rights in the UK 2024, available online at: <https://plan-uk.org/state-of-girls-rights>.

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	<p data-bbox="711 271 1374 383"><i>“Networks facilitate anonymity. If someone harasses or assaults you through networks, many times you don’t even know who to report”- young woman, 23, Spain<sup>13</sup>.</i></p> <p data-bbox="616 439 1374 1160">Girls feel particularly powerless when they realise they do not know who is behind the harassment. In Plan International’s 2020 report, <i>Free to be online? Girls’ and young women’s experiences of online harassment</i>, 32% of girls surveyed reported that they, or a girl or young women they know, have been harassed by anonymous social media users. <b>We suggest that the section on pile-ons and harassment (paragraphs 2.18 to 2.24) should include recognition that perpetrators of pile-ons and harassment are often able to hide behind a veil of anonymity, enabling perpetration without consequence and causing additional distress to girls and young women who are not able to identify their harassers.</b> Under the Online Safety Act, ‘category one’ companies with the largest number of users are required to offer ways for users to verify their identities and control who can interact with them<sup>14</sup>. <b>The Ofcom guidance should reiterate the need and legal duty for social media companies to take action against anonymous accounts in instances of pile-ons and harassment.</b></p> <p data-bbox="616 1216 951 1245"><b>3) Online domestic abuse:</b></p> <p data-bbox="616 1283 1374 1789">We agree and are supportive of the inclusion of domestic abuse and the assessment that “technology exacerbates existing dynamics of power and control. Abuse can now be immediate, constant, and reach a broad social network with minimal effort, having a faster and greater impact on different spheres of the victim’s life” (paragraph 2.26). Plan International’s 2020 report, <i>Free to Be Online? Girls and Young Women’s Experiences of Online Harassment</i>, which conducted research with over 14,000 girls and young women globally, found that one in four girls abused online feel physically unsafe as a result, and online abuse is silencing girls’ voices<sup>15</sup>. For many, online harassment follows them into their homes. We know that there are gaps in support services for younger survivors of domestic abuse. The</p>

<sup>13</sup> Plan International (2020) State of the World’s Girls 2020: Free to Be Online? Available at: [State of the World’s Girls 2020: Free to Be Online? | Plan International](#)

<sup>14</sup> Department for Science, Innovation & Technology (2025) Online Safety Act: explainer. Available at: <https://www.gov.uk/government/publications/online-safety-act-explainer/online-safety-act-explainer>

<sup>15</sup> Plan International (2020) State of the World’s Girls 2020: Free to Be Online? Available at: [State of the World’s Girls 2020: Free to Be Online? | Plan International](#)

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	<p>Children’s society found “around 70% of local authorities in England do not have policies or procedures in place to respond to abusive teenage relationships for those under 18”.<sup>16</sup> The Crime Survey for England and Wales (CSEW) for the year ending March 2023 showed that a significantly higher proportion of people aged 16 to 19 years old were victims of any domestic abuse (8.0%) compared with those aged 45 to 54 years (4.2%) and those aged 60 years and over (3.2% for 60 to 74 years)<sup>17</sup>.The current wording in the guidance risks excluding the reality of domestic abuse facing girls aged under 18, for example paragraph 2.29 focusses on “<b>women</b> feeling physically unsafe”.</p> <p><b>We suggest adding content to this section (paragraphs 2.25 to 2.30) recognise younger survivors of domestic abuse.</b></p> <p>Additionally, the draft guidance highlights in footnote 23 how “girls are at greater risk of experiencing grooming”, and case study 8 focuses on “preventing grooming through safer defaults”. There is a disconnect where the guidance content reflects how service providers can play a role in tackling grooming, however grooming and child sexual exploitation and abuse are not included in the categories of online gender-based harms.</p> <p><b>We therefore suggest the introduction of grooming and child sexual exploitation and abuse as harm categories to reflect girls’ experiences of gender-based online harms.</b></p> <p><b>4) Image-based sexual abuse including intimate image abuse and cyberflashing:</b></p> <p>We agree with the inclusion of image-based sexual abuse including intimate image abuse and cyberflashing in the guidance (paragraphs 2.31 to 2.41), and specifically the inclusion of artificially generated or manipulated images including deepfakes in this section (Paragraph 2.35). In 2024, Plan International working in collaboration with CNN’s <i>As Equals</i>, carried out global research to hear directly from young women and girls aged 13 to 24 about the harms they face online, how they protect themselves, and how tech companies, governments, local communities and their own families should play their part in keeping</p>

<sup>16</sup> The Children’s Society, Missing the mark: Why young people experiencing teenage relationship abuse are being left without the support that they need. Available at: <https://www.childrenssociety.org.uk/sites/default/files/2021-05/missing-the-mark-teenage-relationship-abuse-report.pdf>

<sup>17</sup> Office for National Statistics (2023) Domestic abuse victim characteristics, England and Wales: year ending March 2023. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/articles/domesticabusevictimcharacteristicsenglandandwales/yearendingmarch2023>

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	<p>them safe. Over 80% of the survey participants have seen or received unwanted sexual images or videos<sup>18</sup>. Here in the UK, the Office for Standards in Education, Children’s Services and Skills (OFSTED) carried a rapid review of the prevalence of peer-on-peer sexual harassment and sexual violence. They found that “nearly 90% of girls, and nearly 50% of boys, said being sent explicit pictures or videos of things they did not want to see happens a lot or sometimes to them or their peers”<sup>19</sup>.</p> <p><i>“Last night, I had a really disgusting experience where like it was like 5 minutes past twelve in the morning... some random boy with Snapchat added me and randomly just like started asking me to show stuff” – Workshop participant, Cupar</i><sup>20</sup></p> <p>Image-based sexual abuse including intimate image abuse and cyberflashing is an issue that girls are faced with as they try to navigate their lives online. <b>We are concerned that the current guidance section refers only to adult women as survivors and victims of image abuse (see paragraph 2.38 and 2.41) and strongly urge that these sections include the realities that girls are facing this issue as well.</b></p> <p><b>5) Exclusion of cyberbullying</b></p> <p>We are also concerned that cyberbullying is not referenced in this guidance. Cyberbullying can be defined as “bullying with the use of digital technologies” and entails a “repeated behaviour, aimed at scaring, angering or shaming those who are targeted”<sup>21</sup>. Cyberbullying can be an extension of “offline” bullying, “it follows children home, and victims may experience it every time they turn on their mobile phone or computer”<sup>22</sup>. Girls with intersecting identities, including those who identify as LBtQ+ and girls with disabilities, can be more likely to face</p>

<sup>18</sup> Plan International (2024) Building Digital Resilience: Girls and young women demand a safer digital future. Available at: <https://plan-international.org/publications/building-digital-resilience/>

<sup>19</sup> GOV.UK (2021) OFSTED Review of sexual abuse in schools and colleges, [www.gov.uk/government/publications/review-ofsexual-abuse-in-schools-and-colleges/review-of-sexual-abusein-schools-and-colleges](http://www.gov.uk/government/publications/review-ofsexual-abuse-in-schools-and-colleges/review-of-sexual-abusein-schools-and-colleges)

<sup>20</sup> Plan International UK (2024) The State of Girls’ Rights in the UK 2024, available online at: <https://plan-uk.org/state-of-girls-rights>.

<sup>21</sup> Unicef. Cyberbullying: What is it and how to stop it. Available at: <https://www.unicef.org/stories/how-to-stop-cyberbullying>

<sup>22</sup> Plan International (2013) “A girl’s right to learn without fear: working to end gender-based violence at school”. Available at: [https://plan-international.org/uploads/2022/01/plan\\_srgbv\\_fullreport\\_en.pdf](https://plan-international.org/uploads/2022/01/plan_srgbv_fullreport_en.pdf)

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	<p>cyberbullying<sup>23,24</sup>. In 2024, Plan International worked with adolescent girls and young people aged 15-24 from around the world to develop the <i>Girls' Pact for the Future</i> which highlighted girls' concerns with the current state of the world<sup>25</sup>. <b>Girls highlighted cyberbullying and technology facilitated gender-based violence as a priority issue</b> to be addressed and affirmed research<sup>26</sup> that girls disproportionately face cyberbullying. Online cyberbullying can lead to real world effects as those who are victims of cyberbullying are more than twice as likely to self-harm<sup>27</sup>. <b>Cyberbullying is a stark reality for many girls, and we suggest that the section on content and activity (Chapter 2. "What are online gender-based harms?") at a minimum adds cyber-bullying into paragraph 2.8.</b></p> <p><b>6) Inclusion of girls' and women's right to be online</b></p> <p>Additionally, in <i>Chapter 2: What are online gender-based harms?</i>, we would encourage adding a section highlighting to service providers that girls and women have a right to be online and be themselves online, without the threat of gender based online harms. Plan International's report, <i>Building Digital Resilience</i>, highlights that digital access, know-how, developing skills, online resilience and generally being able to take part in the debates and opportunities of the modern world is a human right and a gender equality issue<sup>28</sup>. When examining the international human rights framework, the 1989 United Nations Convention on the Rights of the Child (CRC) is the key convention for the protection of the rights of children. One of the key principles is expressed in Article 12 which ensures children's rights to express their views and participate in the decision-making processes that affect them. Girls are also protected by the 1979 UN Convention on the Elimination of all forms of Discrimination</p>

<sup>23</sup>Plan International (2013) "A girl's right to learn without fear: working to end gender-based violence at school". Available at: [https://plan-international.org/uploads/2022/01/plan\\_srgbv\\_fullreport\\_en.pdf](https://plan-international.org/uploads/2022/01/plan_srgbv_fullreport_en.pdf)

Bullies Out (2017) "LGBTQ+ Bullying". Available at: <https://bulliesout.com/help-hub/articles/lgbtq-bullying/>

<sup>24</sup> United Nations (2025) "Women, girls bear brunt of cyberbullying against persons with disabilities". Available at: <https://news.un.org/en/story/2025/03/1160981>

<sup>25</sup> Plan International (2024) *Girls' Pact for the Future*. Available at: <https://plan-international.org/publications/girls-pact/>

<sup>26</sup> Plan International (2024) *Building Digital Resilience: Girls and young women demand a safer digital future*. Available at: <https://plan-international.org/publications/building-digital-resilience/>

<sup>27</sup> Swansea University (2018) *Young victims of cyberbullying twice as likely to attempt suicide and self harm*, [www-2018.swansea.ac.uk/press-office/news-archive/2018/youngvictimssofcyberbullyingtwiceaslikely-toattemptsuicideandself-harmstudyfinds.php](http://www-2018.swansea.ac.uk/press-office/news-archive/2018/youngvictimssofcyberbullyingtwiceaslikely-toattemptsuicideandself-harmstudyfinds.php)

<sup>28</sup> Plan International (2024) *Building Digital Resilience: Girls and young women demand a safer digital future*. Available at: <https://plan-international.org/publications/building-digital-resilience/>

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	<p>against Women (CEDAW), which calls on the international community to undertake measures to end gender discrimination in all forms. In 2017, CEDAW adopted a general recommendation recognising that gender-based violence happens in ‘all spaces and spheres of human interaction’, including ‘technology-mediated environments such as contemporary forms of violence occurring on the internet and in digital spaces’<sup>29,30</sup>.</p> <p>Our 2024 research, <i>The State of Girls’ Rights in the UK</i>, found that online life is a huge source of happiness for girls and young women online and 86% of girls and young women are happy with their online life, second only to relationships and friendships<sup>31</sup>. Yet only 9% of girls and young women feel completely safe online. Women and girls have a right, and want, to engage in the digital world, but their lived experiences is one of feeling unsafe and unsupported. Ensuring life online is a safe place for women and girls is not only critical but plays a role in advancing their rights. <b>There is opportunity here to therefore centre a rights-based approach and highlight that tech companies have a duty to act to ensure that all women and girls are able to access their right to be safe online.</b></p>
<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 welcome the safety-by-design approach to women and girls’ online safety and are supportive of encouraging providers to consider all forms of gender-based harms “throughout the product development lifecycle” (paragraph 3.5). However, we are concerned that there is no reference to how the safety by design approach should reflect human rights. <b>We would therefore suggest that paragraphs 3.5 to 3.7 recognise the responsibility of technology firms to respect and support human rights</b> with specific reference to the right to respect (Article 8 of the Human Rights Act), right to life (Article 2), right to freedom from torture, inhuman or degrading treatment (Article 3) and the right to freedom of expression (Article 10)</p>

<sup>29</sup> Plan International UK (2017) “You Can’t Live Without It” Girls’ Rights in the Digital World. Available at: <https://plan-uk.org/about-us/advocacy-policy-and-research/publications/girls-rights-in-the-digital-world>

<sup>30</sup> Plan International (2020) State of the World’s Girls 2020: Free to Be Online? Available at: [State of the World’s Girls 2020: Free to Be Online? | Plan International](https://plan-uk.org/state-of-the-worlds-girls-2020-free-to-be-online/)

<sup>31</sup> Plan International UK (2024) The State of Girls’ Rights in the UK 2024, available online at: <https://plan-uk.org/state-of-girls-rights>

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	<p><b>within their safety-by-design approach<sup>32</sup>. Service providers should implement their corporate responsibility to respect human rights in line with the UN Guiding Principles on Business and Human Rights<sup>33,34</sup>.</b></p> <p>Below is an outline of Plan International UK’s comments on the nine proposed actions.</p> <p><b>1) Taking responsibility (Actions 1 – 3)</b></p> <p>We are supportive of the focus on “establishing overarching governance and accountability processes that ensure women and girls’ online safety is at the heart of design choices” (paragraphs 3.5 – 3.7). Girls around the world are actively calling for internet, social media and other third-party platforms to be held to account for addressing online safety<sup>35</sup>.</p> <p><i>“Big corporations have so much power, unless they become better regulated, they’ll keep doing it” – Focus group participant<sup>36</sup></i></p> <p>Central to this, is for service providers to adopt gender transformative approaches which have an explicit intention to transform unequal power relations, addressing the root causes of inequality<sup>37</sup>. The guidance currently includes an ambition for “<i>gender-sensitive governance and risk assessment processes</i>” (paragraph 3.6) which would acknowledge and accommodate gender differences. A gender transformative approach, on the other hand, would seek to address the root causes of inequality, encouraging tech companies to embed cycles of critical reflection in their design of governance and risk assessment processes to consider their role in advancing transformative change for women and girls. In practice, this could for example, involve going beyond simply identifying and acting on an</p>

<sup>32</sup> Equality and Human Rights Commission (2018) The Human Rights Act. Available at: <https://www.equalityhumanrights.com/human-rights/human-rights-act>

<sup>33</sup> Plan International (2020) State of the World’s Girls 2020: Free to Be Online? Available at: [State of the World’s Girls 2020: Free to Be Online? | Plan International](https://www.plan-international.org/publications/state-of-the-worlds-girls-2020-free-to-be-online/)

<sup>34</sup> United Nations Human Rights (2012) Guiding Principles on Business and Human Rights: Implementing the United Nations “Protect, Respect and Remedy” Framework. Available at: <https://www.ohchr.org/en/publications/reference-publications/guiding-principles-business-and-human-rights>

<sup>35</sup> Plan International (2024) Building Digital Resilience: Girls and young women demand a safer digital future. Available at: <https://plan-international.org/publications/building-digital-resilience/>

<sup>36</sup> Unpublished findings from focus group discussions conducted in 2024 that consisted of: one online mixed sex focus group discussion with 8 Plan International UK Youth Advisory Panel members, one girls’-only focus group discussion with 12 young people aged 15 to 18 years old with the organisation *Her Voice Wales* from the Vale of Glamorgan, and one boys-only focus group discussion with 8 young people aged 14 to 15 years old that attend Greenhill School in Tenby, Wales.

<sup>37</sup> See for example Plan International (2020) Introducing the gender transformative marker. Available at: <https://www.planusa.org/blog/introducing-the-gender-transformative-marker/>

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	<p>online harm that disproportionately impacts women and girls compared to identifying how technology is driving or contributing to the root cause of that harm and then taking actions to tackle their contribution to that root cause as a service provider.</p> <p><b>We would encourage the inclusion of a ‘best practice’ demonstrating gender transformative approaches that go beyond gender sensitive approaches.</b></p> <p>We welcome the steps outlined in actions 1 to 3, in particular:</p> <ul style="list-style-type: none"> <li>• We agree with the steps outlined in action one, including having a named accountable individual in the organisation and creating written statements of responsibility (paragraph 3.11). We are concerned that action 1.e (paragraph 3.11e) on ‘monitoring trends’, does not go far enough to require service providers not only to track evidence of new kinds of illegal content, <b>but should actively call on providers to act on and ban these new kinds of illegal content as they emerge, and ensure that there is information sharing across platforms on what is working to tackle emerging kinds of online gender-based harms.</b> There should also be monitoring and action taken on new types of content that may not be classified as illegal or covered under existing laws or guidance, but cause harm to women and girls.</li> <li>• We are encouraged by the guidance in action 2 to engage with survivors and victims’ to better understand their experiences (paragraph 3.19c) and <b>would go further to include specific reference to engaging meaningfully with girls and young people in all their diversity. This includes taking steps to consult with girls and young women and include them in the design and development of enhanced reporting mechanisms and enhanced content moderation</b><sup>38</sup>.</li> <li>• We welcome the guidance in Action 3 for providers, as part of transparency reporting, to share information about the prevalence of different forms of gender-based harms (paragraph 3.26). However, we <b>would recommend that in addition to race and gender disaggregated data, service providers should be encouraged to collect and report on age disaggregated data at a minimum in order to monitor the impacts of online gender-based harms on girls.</b> The guidance should also be clearer on who the information will be</li> </ul>

<sup>38</sup> Plan International (2020) State of the World’s Girls 2020: Free to Be Online? Available at: [State of the World’s Girls 2020: Free to Be Online? | Plan International](#)

Question	Your response
	<p>shared with, laying out the need for transparency for data to be publicly available.</p> <p><b>2) Preventing Harm (Actions 4 – 6)</b></p> <p>We welcome the approach to harm prevention and inclusion of “engaging with men and boys to tackle misogynistic narratives and cultural norms that justify and glorify harmful behaviour” and support education through providing supportive or deterrence messaging (Paragraph 4.11). This aligns with what young people would like to see: over half (56%) of girls and young women we spoke to said they felt “education to change boys’ and men’s attitudes and behaviour towards women” would help them feel safer and more protected<sup>39</sup>. Young men and boys have also articulated the need for education to tackle harmful behaviour. In mixed gender focus group discussions, including an all-boy focus group, young people agreed that more support for boys was needed, including better education. One young person shared:</p> <p><i>“Education is the key, resources are needed to tackle deep rooted harmful stereotypes that are currently socially accepted”<sup>40</sup> – Focus group participant</i></p> <p>We welcome the steps outlined in actions 4 to 6, in particular:</p> <ul style="list-style-type: none"> <li>• We agree that safeguards that are outlined in the foundational steps and currently specific to children would be useful for <b>all</b> users, providing women and girls a suite of options to support their safe navigation of online spaces.</li> <li>• <b>Content moderation</b> (paragraph 4.37a): Girls are calling for strengthened and improved content moderation to identify and remove perpetrators of online gender-based harms. It is imperative not to rely too much on automation, which is less effective at identifying unacceptable content, or understanding context, than a trained human moderator<sup>41</sup>. <b>This action should therefore include recommendations for strengthened human moderation to identify and tackle online gender-based harms.</b></li> </ul>

<sup>39</sup> Plan International UK (2024) The State of Girls’ Rights in the UK 2024, available online at: <https://plan-uk.org/state-of-girls-rights>

<sup>40</sup> <sup>40</sup> Unpublished findings from focus group discussions conducted in 2024 that consisted of: one online mixed sex focus group discussion with 8 Plan International UK Youth Advisory Panel members, one girls’-only focus group discussion with 12 young people aged 15 to 18 years old with the organisation *Her Voice Wales* from the Vale of Glamorgan, and one boys-only focus group discussion with 8 young people aged 14 to 15 years old that attend Greenhill School in Tenby, Wales.

<sup>41</sup> Plan International (2020) State of the World’s Girls 2020: Free to Be Online? Available at: [State of the World’s Girls 2020: Free to Be Online? | Plan International](#)

Question	Your response
	<ul style="list-style-type: none"> <li>• <b>Allowing users to verify their identity</b> (paragraph 4.40b): Girls are actively calling for stronger identity verification requirements. During focus group discussions as part of Plan International’s <i>Building Digital Resilience</i> research, participants discussed how new technological developments could help keep them safe by increasing security and verifying user accounts. Girls talked about how this would help with identification of perpetrators and action could then be taken to hold perpetrators to account<sup>42</sup>.</li> </ul> <p><b>3) Supporting women and girls (Actions 7 – 9)</b></p> <p>We welcome recognition that “women and girls should have more agency to shape their online lives, and those that experience harm should be offered appropriate support” (paragraph 5.7). We know that being online is a source of happiness and joy for girls across the UK. Our research on <i>the State of Girls’ Rights in the UK</i> found that girls clearly value feeling connected as part of their community, whether in-person or online<sup>43</sup>. Plan International’s global research, <i>Building Digital Resilience</i>, demonstrated how self-reliant girls and young women are when it comes to digital resilience – there is a sense throughout of them taking whatever is thrown at them in their stride and an overall determination to protect themselves and each other, and to refuse to be intimidated. But they shouldn’t have to do it on their own, and <b>we welcome guidance for tech companies to support girls and young women to have more agency online.</b></p> <p>In our response to question 1 of this consultation, we highlighted the need to ensure that a safety-by-design approach reflects human rights approaches and recommend that this is brought out more in actions 7-9 when discussing approaches to support women and girls to be online. Girls have a right to participate in online life without threats of violence or abuse. Silencing girls’ voices and restricting their opportunities is not the answer: Girls and young women need service providers to step up, listen to them, and support them with all the means at their disposal<sup>44</sup>.</p>

<sup>42</sup> Plan International (2024) Building Digital Resilience: Girls and young women demand a safer digital future. Available at: <https://plan-international.org/publications/building-digital-resilience/>

<sup>43</sup> Plan International UK (2024) The State of Girls’ Rights in the UK 2024, available online at: <https://plan-uk.org/state-of-girls-rights>

<sup>44</sup> Plan International (2024) Building Digital Resilience: Girls and young women demand a safer digital future. Available at: <https://plan-international.org/publications/building-digital-resilience/>

Question	Your response
	<p>We welcome the steps outlined in actions 7 – 9 to support women and girls, and in particular note:</p> <ul style="list-style-type: none"> <li>• <b>Supportive information (paragraph 5.15f):</b> We agree that tech providers should signpost users to supportive information which addresses specific harms. <b>This could also go further by encouraging tech providers to develop a range of training programmes tailored to different age groups and levels of digital literacy such as hosting workshops, webinars and interactive sessions covering online safety topics to support women and girls to navigate their lives online sagely.</b></li> <li>• <b>Report tracking (paragraph 5.20b):</b> we are supportive of the good practice steps to strengthen reporting systems. A key recommendation from Plan International’s <i>Building digital resilience</i> research is <b>for tech providers to create a follow up report mechanisms so that victims have the ability to follow their reported incident and can clearly see what steps are being taken to resolve their cases</b><sup>45</sup>. Our 2020 research found that although reporting and blocking were used most in attempting to combat harassment, both proved ineffective. A significant number of people need to report an account before action will be taken, which makes the procedure almost entirely useless for safeguarding girls, who may not be supported by huge numbers of people or may be targeted by one-one-one harassment. <b>Service providers should ensure that women and girls are able to easily access and understand the reporting systems, and receive feedback on what happened as a result of their report.</b></li> <li>• <b>Enforcement action (paragraph 5.25a):</b> We are supportive of guidance for service providers to take enforcement action against users who continually violate a service’s terms of service. <b>This action can be further strengthened to highlight that providers must hold perpetrators to account and apply sanctions in line with other platform violations. Service terms and conditions should be simple and visible so that platform users understand what to expect and where to go for information and support.</b> Accessible, easy-read and age-appropriate terms and conditions should also be available to support users with different needs – including</li> </ul>

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<sup>45</sup> As above.

Question	Your response
	<p>children under 18 - to understand what they should expect from the service.</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>See our response to Question 2 which includes commentary on how good practice steps can be strengthened further.</p> <p>Additionally, there is currently no “good practice” case study focused on how service providers can meaningfully and continually engage with women and girls to get feedback on their experiences of their services. In 2020, Plan International published the <i>State of the World’s Girls 2020: Free to Be Online? report</i>, which brought together the voices and experiences of over 14,000 girls aimed at uncovering and understanding their experiences of being online. Following the report, Facebook, Instagram and WhatsApp platforms completed a series of Listening Sessions with 15 girls and young women from around the world, giving policy and product teams an opportunity to hear directly from girls about their lived experiences on social media, creating a dialogue about more ways the companies can continue to invest in protecting girls from bullying and harassment. The group was made up of 10 activists from Plan International’s Global Youth Networks and five representatives from civil society organisations, including girls from Japan, Brazil, India, UK, U.S., Spain, Germany, Benin, Kenya and the Philippines. Following the listening sessions, one of the young leaders was invited to provide ongoing input into tools, resources and policies that support women and girls’ safety, representing her community and network of girl activists<sup>46,47</sup>.</p>
<p><b>Question 4:</b> Do you have any feedback on our approach to encouraging providers to follow this guidance, including our pro-</p>	<p>Confidential? – N</p> <p>We recognise the limitations for enforcement of this guidance beyond the “foundational steps” which are informed by Codes of Practice and compliant with legal duties. We endorse the Online VAWG</p>

<sup>46</sup> Plan International Australia (2021) Girl activists meet with Facebook platforms to tackle online abuse. Available at: <https://www.plan.org.au/media-centre/girl-activists-meet-with-facebook-platforms-to-tackle-online-abuse/>

<sup>47</sup> Plan International Australia (2021) Free to Be Online. Available at: <https://www.plan.org.au/free-to-be-online-2/>

Question	Your response
<p>posal 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>Network's recommendation for the guidance to be <b>“made into a legally binding Code of Practice to give Ofcom the necessary power to ensure measures are introduced and enforce against companies prioritising profits over safety”</b>.</p> <p>We are also concerned that framing 'good practice' as a 'go further' option rather than a 'foundational step' could enable service providers to do the minimum without fully exploring or implementing the good practice steps. Many of the steps outlined in 'good practice' steps are areas that girls have called on service providers to do as a minimum rather than an action for companies to go further. For example, Plan International's <i>Free to be Online? Girls and Young Women's Experiences of Online Harassment</i> <sup>48</sup> research with over 14,000 girls highlighted the need for social media companies to collect and publish disaggregated data on online gender-based violence that tracks the scale and size of the problem. The spirit of this recommendations is captured in the good practice step outlined in paragraph 3.26 in the draft Ofcom guidance, and there is a risk that service providers opt not to carry out the action as it is not categorised as foundational. <b>Stronger language could therefore be used to ensure that 'good practice' steps are considered as necessary actions to support women and girls' online safety by service providers, rather than seen as a nice 'add on'</b>. We echo the Online VAWG Network's suggestion for “foundational steps” to be changed to “minimum steps”, and for case studies to sit alongside the “minimum steps” section, as opposed to the good practice sections where they currently are positioned.</p> <p>Additionally, <b>we encourage Ofcom to create a plan for the socialisation of the final guidance with users of online services with a specific focus on ensuring an intersectional approach is adopted to reach women and girls in all their diversity</b>. This can support women and girls to know exactly what they should expect from social media companies and service providers so that they can make informed decisions on which platforms to use and hold companies to account should their service fall short of the expectations outlined in the guidance.</p>

<sup>48</sup> Plan International (2020) State of the World's Girls 2020: Free to Be Online? Available at: [State of the World's Girls 2020: Free to Be Online? | Plan International](#)

Question	Your response
<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? – Y / N</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 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>Ofcom should consider ensuring that guidance is available across a number of languages, including English and Welsh, to support women and girls for whom English may not be their first language, to be able to engage with the guidance and know the actions that service providers should be taking to protect women and girls' safety online. Ofcom can learn from UK Government initiatives for publishing guidance in multiple languages, for example, NHS COVID-19 guidance was translated into 40 languages, and GOV.UK pages are available in over 60 languages<sup>49,50</sup>.</p>

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

<sup>49</sup> Healthwatch Hackney (2020) NHS official guidance on COVID-19 now available in 60 languages. Available at: <https://www.healthwatchhackney.co.uk/news/nhs-official-guidance-on-covid-19-now-available-in-60-languages/>

<sup>50</sup> GOV.UK (2022) How we improved translations on Gov.UK. Available at: <https://insidegovuk.blog.gov.uk/2022/02/09/how-we-improved-translations-on-gov-uk/>