



Consultation response form

Your response

Question	Your response
Question 1: Do you have any comments on our proposed approach to 'content and activity' which 'disproportionately affects women and girls'?	Confidential? – N See detailed response in the attached document (too long to include in this table).
Question 2: Do you have any comments on the nine proposed actions? Please provide evidence to support your answer.	Confidential? – N The nine proposed actions represent an ambitious and welcome framework that rightly emphasizes the importance of design, governance, and accountability. Particularly strong are Action 1 (ensuring governance and accountability), Action 4 (abusability evaluations), and Action 5 (safer defaults). These reflect a growing recognition that safety cannot be outsourced to the user; it must be built into the architecture of platforms. However, several improvements would enhance the impact of these actions: <ul style="list-style-type: none">• Set clearer expectations: Platforms need more specific benchmarks for what counts as effective implementation. For instance, Action 3 on transparency would benefit from a minimum set of disaggregated metrics (e.g. volume and type of abuse reports, speed of moderation, demographic impact).• Address algorithmic amplification: The guidance should more explicitly address the role of recommender systems in spreading misogynistic and abusive content. Risk assessments that ignore this dimension will fall short of tackling root causes.

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	<ul style="list-style-type: none"> Account for smaller platforms: While flexibility is needed, guidance should provide scalable models for medium and small platforms that lack the resources of tech giants but still pose meaningful risk to users.
<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>The inclusion of good practice steps and case studies is helpful and gives tangible shape to otherwise abstract principles. For example, bundling default safety settings for users facing coordinated abuse is a strong and user-centric intervention. Similarly, case studies drawn from industry (e.g. block-multiple-accounts tools, AI-assisted moderation, red teaming) show the guidance is grounded in current technical reality.</p> <p>Nonetheless, good practice steps should be more clearly evaluated through the lenses of:</p> <ul style="list-style-type: none"> Transferability: Can they be adapted for smaller or resource-limited platforms? Are they feasible across different types of services—e.g., livestreaming, forums, or gaming? User agency and privacy: Measures like proactive detection tools must include safeguards against overreach and false positives, particularly for marginalized users who are disproportionately flagged by automated systems. <p>Ofcom could also draw more explicitly on international examples—such as Australia’s eSafety Commissioner and the UN’s TFGVBV initiative—to broaden the scope of good practice and foster global coherence in standards.</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>The proposed assessment to be published 18 months after final guidance is a promising accountability mechanism. Making visible which platforms are taking meaningful steps—and which are not—will support public awareness and put reputational pressure on providers.</p> <p>To build on this, I would recommend:</p> <ul style="list-style-type: none"> Naming and praising high-performing platforms, as well as publicly calling out laggards. Visibility

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	<p>will be a more powerful motivator than behind-the-scenes engagement alone.</p> <ul style="list-style-type: none"> • Incentivizing participation: Platforms that adopt the guidance early could be recognized through awards, procurement preferences, or light-touch regulatory pathways. • Embedding survivor expertise: Establish formal consultation panels with survivors and frontline organizations to regularly assess implementation and adjust the guidance in response to lived experience.
<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>Ofcom’s impact and equality assessments are a vital part of this consultation, but they should go further. Specifically:</p> <ul style="list-style-type: none"> • Freedom of expression must be reframed not merely as a right that might be infringed by moderation, but as a right that is undermined by unchecked abuse. Women and girls’ expressive freedom is curtailed every time they are harassed off platforms or silenced by threats. • Intersectional equality impacts should be explicitly measured, with data collection disaggregated by race, gender identity, disability, and age. Without this, progress risks being uneven or regressive. • The final guidance should be accompanied by clear indicators for measuring impact, not only on safety outcomes, but on trust, well-being, and participation rates among women and girls.
<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</p>	<p>N.A.</p>

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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.