



## Your response

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<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> <ul style="list-style-type: none"><li>- Broadly agree with the approach to best practice to help inform guidance in this space – also generally agree with who the 'content and activity' approach applies to.</li><li>- We feel there should be additional narrative around how these processes will engage with police processes, and how tech firms will engage with police to notify them of trends and themes in online harm – at present, engagement is poor with some – not all but some social media sites. This is in relation to harm and vulnerability more broadly, examples can be provided in relation to some social media sites not removing indecent images of children and not engaging with police to do so.</li><li>- In relation to the four harms outlined, agree with those included. However, whilst there is reference to stalking and harassment as part of coordinated group responses, and as a form of online domestic abuse, there is also stalking and harassment that can take place online on an individual basis where there has been no previous intimate partner relationship.</li><li>- We believe there should be a strong and consistent approach to recording and scrutiny of incidences to provide appropriate early intervention programmes, and prevention messaging for women and girls.</li><li>- Encourage the guidance to be more specific on what is referred to as 'harm' but also enable some level of flexibility in what might harm women and girls individually and separately. People's lived experiences should help define harm in this context.</li><li>- There must be effective and accessible support available online for women and girls who have been affected – and an effective/recognisable process for reporting. Following on from this point, we wish to note that further information</li></ul>

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	<p>would be welcomed in relation to how this support may link with existing support services commissioned by PCCs. We feel this would be an ideal opportunity for engagement between our organisations to enhance quality and reach of support for victims of online harm.</p> <ul style="list-style-type: none"> <li>- There exists a significant gap in the categorization of stalking, as it is currently subsumed under 'coercive control' rather than being recognized as a distinct category. This misclassification raises concerns that victims may be unable to adequately protect themselves or may encounter barriers due to the definition, particularly non-intimate victims of stalking. These individuals may not report incidents because they do not perceive them as 'coercive control' or 'domestic abuse,' given the absence of a relationship context. This represents a substantial definitional gap, as non-intimate partner violence (non-IPV) victims do not fit within the frameworks of coercive control or domestic abuse, nor do they identify themselves as such.</li> <li>- In addition to this, Honor based abuse/violence is missing in this. Unsure as to which category of harm this would fit into.</li> <li>- There is an educational piece missing here - does a young person know the laws etc. consider a dual focus on media literacy.</li> <li>- What is the focus on prevention and education – technology and social media companies could do more to prevent online harm, and must work with law enforcement and victims / survivors to define prevention and set out what an appropriate approach to prevention looks like. Addressing the root causes of online misogyny and abuse requires a multi-faceted approach, with a need for engagement/leadership from big tech companies. There needs to be greater focus on digital literacy programs, campaigns to challenge harmful attitudes and behaviours and initiatives to empower people of all genders to navigate online spaces safely.</li> <li>- Consideration will need to be given to how providers will 'future proof' their solutions to addressing these harms, to reflect the diversity in</li> </ul>

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	<p>online platforms and the evolving nature of the technology utilised and associated harms caused.</p> <ul style="list-style-type: none"> <li>- We would encourage better engagement with Police and Crime Commissioners to support with work around public engagement, reporting, prevention and oversight of police engagement. In Wales, PCCs support an all-Wales Criminal Justice Board, through which the four Local Criminal Justice Boards are supported. Compliance with the MoJ Victims Code of Practice is undertaken in a coordinated way through the Wales CJB, which is underpinned by a Survivor Engagement Network. We would encourage engagement with such networks when developing policies that will protect and safeguard women and girls online.</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> <ul style="list-style-type: none"> <li>- We broadly agree with the nine proposed actions.</li> <li>- Agree with the approach and commitment to ensuring robust governance and accountability processes to address harm are in place. This is particularly helpful for victims, which will provide them with reassurance that accountability will be upheld for any targeted online harm. The guidance should explicitly reference the benefit of companies including diverse representation in their leadership teams and/or as part of their decision-making processes.</li> <li>- Under the 'Taking Responsibility' proposed action, we welcome risk assessments to be developed through engagement with survivors, and encourage Ofcom to work with PCCs in Wales to do so – PCCs in Wales have built an effective network of survivors through our duties under the Victims Code of Compliance and can therefore ensure there is appropriate reach for survivors in Wales.</li> <li>- We support the action to enable users enhanced controls over their experiences. Those experiencing harm online can often deter them from engaging in any online activity, however if</li> </ul>

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	<p>women and girls are reassured they have some level of control over their experiences, this will provide a safe environment for them to engage.</p> <ul style="list-style-type: none"> <li>- Action 6 – this action is particularly important and we welcome the mention of activities such as frictions and hash matching. The guidance should also address the use of AI to generate and disseminate non-consensual deepfake imagery.</li> <li>- Agree with the point about building an effective reporting system – however it must be emphasised that reporting is accessible, trauma-informed, optional and should provide assurances that should an incident be reported, something will be done about it. Reporting mechanisms must be designed in a way that minimises the risk of re-traumatisation and most importantly are clear and straightforward. This interaction with the victim will be important to safeguarding, as well as future experiences.</li> <li>- Tech companies should also be required to implement signposting mechanisms to specialist support services.</li> <li>- Reporting concerns arise when individuals are left solely in the hands of technology companies after reporting incidents such as image-based abuse or online harassment. There is a reliance on these companies to offer support, and if individuals do not seek help elsewhere, they may be left without adequate guidance. This can leave them struggling with their emotions and a lack of understanding regarding domestic abuse, sexual violence, or trauma, and how to navigate these issues effectively. Consider national helplines/safeguarding information post report.</li> <li>- Interaction with the police is important particularly if the harm is significant however there is little mention in the guidance. There needs to be stronger emphasis on collaboration between tech companies and law enforcement agencies to ensure that perpetrators can be held accountable.</li> <li>- Action 9 – We are supportive of the good practice steps focused on enforcement action and hiding content while it is assessed. It would be</li> </ul>

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	<p>helpful to have examples of actions that tech companies should take with regards to supporting survivors/victims and cooperating with law enforcement.</p> <ul style="list-style-type: none"> <li>- Ensuring that the language and lay-out/design are appropriate for young people is crucial. It is important to capture the perspectives of children who cause harm, understand the underlying reasons for their behaviour, and identify the methods they employ.</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 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> <ul style="list-style-type: none"> <li>- The good practice steps and case studies provide valuable examples of how tech companies can take action to address online gender-based harms. However, their effectiveness will vary depending on the specific context and commitment of individual companies. The guidance should acknowledge that there is no one-size-fits-all method and encourage companies to tailor their approaches to their specific platforms and user bases. A stronger focus here on evaluation would also be positive here - how companies might measure the impact and assess whether they are achieving their intended outcomes</li> <li>- It might be helpful to establish a platform/mechanism by which companies, following the launch of the guidance, can share best practice, innovations, impact of activities and solutions to barriers that they have identified. This might help to support the more proactive companies to encourage those companies that require more direction.</li> <li>- Including cultural competency considerations (and other protected characteristics) might be helpful within good practice steps and case studies, where applicable.</li> <li>- While we focus on negative contributors online, we must equally support and encourage positive contributors within online spaces.</li> <li>- It would be helpful to identify case studies that demonstrate wider harms that often combine or follow on from online harms, such as materials targeted to those experiencing self-harm issues</li> </ul>

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	<p>and eating disorders and those suffering from online abuse more broadly.</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? – N</p> <ul style="list-style-type: none"> <li>- Agree and support the approach to encouraging providers to follow this guidance – however it is important to ensure providers are aware of the views and experiences of survivors from their perspective to understand and recognise the harm that can be caused.</li> <li>- Companies should adopt a more proactive approach in reaching out to individuals who report or block certain accounts. Platforms should notify users about default settings and ways to protect themselves. There is potential for creating a dashboard or process specifically for young people to track the status of their complaints, including the process and timeframe involved.</li> <li>- Publishing an assessment of how providers are addressing safety is a welcomed approach. This will create several benefits, including an improvement of confidence from women and girls to demonstrate action is being taken and their safety online is paramount. An assessment, which will be published, will also demonstrate the commitments of providers, which can support objectives targeted at accountability. In addition, an assessment will ensure there is fair, equal and proportionate approaches and responses by all providers, not just by some.</li> <li>- To support this action further – We would suggest an advisory board to provide oversight and scrutiny of these assessments. An advisory board could comprise of practitioners, survivors, public, third and private sector partners – however should such an approach be developed, it will need to have equal and proportionate representation from Wales.</li> <li>- Consider how to monitor the impact of guidance and the adoption by technology companies, with the intention of publishing a report regarding the uptake. Reviews and investigations will be ongoing, and companies will be required to release</li> </ul>

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	<p>data to Ofcom, thereby enhancing transparency and scrutiny through greater oversight powers. In addition to this, consider ways in which the guidance has had an impact on women and girls safety experiences online.</p> <ul style="list-style-type: none"> <li>- Leveraging the power of public opinion and consumer choice will help to hold companies accountable for their actions, by shining a light on good and poor practice.</li> <li>- The guidance could state the benefit of fostering greater collaboration between tech companies, VAWG specialist services, key professionals including public sector, researchers and government agencies to support the sharing of knowledge, the development of innovative solutions and addressing of emerging challenges.</li> <li>- We also would like to emphasise that tech companies have more direct responsibilities for reporting the police in key areas of online harm and should be an agreed threshold. In doing this, tech companies must engage with high-tech crime teams within police forces.</li> </ul>
<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> <ul style="list-style-type: none"> <li>- Agree and support the content of each impact assessment.</li> <li>- A suggestion would be to conduct these assessments in parallel with survivors or consultation on finished assessments with a small group of survivors for quality testing.</li> <li>- Impact assessments need to be cognisant of the differences in Welsh and English policy, as outlined in question 6 below.</li> <li>- A further suggestion would be to ensure an impact assessment is completed for women as an individual group, as well as children as an individual group. Guidance for young boys should take the same level of precedence as guidance for girls due to their vulnerability to online harm.</li> <li>- Agree that women and girls are disproportionately impacted by online harm and are less likely to report online harms/abuse. Sextortion impacts men more than women - be careful on</li> </ul>

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	<p>how this guidance is published - not to segregate men and boys.</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> <ul style="list-style-type: none"> <li>- This must be considered within the context of understanding devolution in Wales, who it applies to and the interactions and collaborations that exist to provide action against violence of women and girls.</li> <li>- In Wales, the Violence Against Women, Domestic Abuse and Sexual Violence (VAWDASV) Act was introduced in 2015. The Act places duties on relevant authorities in Wales to take a coordinated approach to responding to and supporting those affected by VAWDASV, this also includes setting out a strategic and coordinated plan in order to do this.</li> <li>- Police, Justice services and PCCs remain reserved to the UK Government and therefore, there is no statutory obligation to deliver the principles and objectives of the act. However, in Wales over several years, effective working relationships have developed between devolved and non-devolved agencies – therefore in many cases, the way in which we work with women and girls in Wales from a protection and support perspective is of high quality.</li> <li>- We feel that the guidance will provide positive impacts in Wales, however we would encourage appropriate coverage of the guidance to ensure both devolved and non-devolved services are aware of the proposed principles and actions.</li> <li>- In doing this, we would encourage and welcome specific engagement with PCCs when delivering the guidance. PCCs are often seen as the ‘bridge’ for engaging devolved and non-devolved services, bringing agencies together to work effectively in collaboration. PCCs also provide funding for commissioned services to work with women and girls – as well as providing platforms for survivor engagement opportunities.</li> </ul>

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	<ul style="list-style-type: none"><li>- Any guidance and ongoing engagement activity must be available in Welsh to satisfy the requirements of women and girls whose first language is Welsh.</li></ul>

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