

# 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>We generally welcome the comprehensive approach that considers a range of intersectional and structural gendered harms.</p> <p>We particularly welcome the specific acknowledgement of the impact on women in public life (“While pile-ons can happen to any user, they often target women in public life, such as journalists, politicians, and celebrities. They can also include gendered disinformation, which can be used in coordinated harassment campaigns against women and girls in public life.”) This aligns with our <a href="#">Jo Cox Foundation Civility Commission</a> recommendations that the specific issue of abuse and intimidation of elected politicians be considered when implementing the Online Safety Act, and that OfCom must actively seek the advice of civil society organisations with expertise in this area.</p> <p>We might suggest adding that such abuse does not only impact women currently active in public life, but has broader impacts that threaten equal participation in democracy. For example, The <a href="#">Alan Turing Institute</a> found that three in four women do not share their political opinions online for fear of online harms. And, <a href="#">Girlguiding</a> found that over a third of young women and girls were put off from entering certain careers, including politics, because of the abuse they see directed at high profile women online.</p> <p>We might also suggest that the four harms specifically include pornographic/sexually explicit deep fakes as this is a growing concern among women in public life.</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>We generally welcome the nine proposed actions as comprehensive and, if implemented, potentially effective at addressing gender-based harms online.</p>

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<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>We generally welcome the information suggested in the document.</p> <p>In particular, we welcome the encouragement for platforms companies to engage more significantly with victims, experts local contexts.</p> <p>We might also suggest specific actions/cases of engagement with women in public life and their staff, including local politicians who may be particularly at risk in certain local contexts when local tensions arise. A growing body of evidence including from our work with the <a href="#">Jo Cox Foundation Civility Commission</a> as well as the <a href="#">Electoral Commission</a>, and the <a href="#">Local Government Association</a> shows that political candidates and local government elected representatives face abuse.</p> <p>Our <a href="#">Jo Cox Foundation Civility Commission</a> Call to Action recommends that Social media companies acknowledge the democratic significance of local politicians and provide better and faster routes for councillors reporting abuse and misinformation online (in addition to the support provided to national politicians). This supports the call made by the Local Government Association in their <a href="#">Debate Not Hate publication</a>.</p> <p>We also particularly welcome the suggestion to create a media-literacy-by-design policy. Our Jo Cox Civility Commission work affirms the importance of strengthening media literacy. We would recommend in this guidance or elsewhere, a specific suggestion for platforms to share basic information about political systems and identifying mis-information during election times - continuing the <a href="#">partnership</a> work between OfCom, ShoutOutUK and the Electoral Commission from last year. We welcome the suggestion for persuasion/nudging as some stakeholders have suggested to us that this might be a particularly effective tool to mitigate people sending abuse to people in public life.</p> <p>We welcome the good practice in relation to ensuring that intersectional harms are considered, but might suggest a more comprehensive definition and guidance to ensure that these unique harms are considered. <a href="#">Glitch UK</a> has helpful resources on this key topic.</p>
<p><b>Question 4:</b> Do you have any feedback on our approach to encouraging providers to follow this guidance,</p>	<p>Encouraging platforms to adopt this voluntary guidance may be challenging, especially in the context of recently announced changes by social media companies on reducing content moderation capacities.</p>

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<p>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>Perhaps the principle of "empower the public to make informed choices about the services they use" could be the most effective avenue. OfCom could continue to partner with other organisations to share accessible, public information about what platforms are doing (and not doing) to make users safe.</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>We generally welcome the approaches to the impact assessments.</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>We do not have particular expertise on this issue but welcome the commitment to include the Welsh language in the guidance.</p>

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