

## 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>I believe the four areas identified as “harm” that disproportionately affects girls and women cover a wide range of harmful practices. I find particularly useful that the guidance has included image-based sexual abuse.</p> <p>My comment refers to two main areas.</p> <p>The first is pornography. While the guidance refers to pornography, it does so almost exclusively in relation to the harms to children. While this is certainly a very valid concern, which must be addressed, the harms of pornography are also specific to women and girls. The guidance refers specifically to “extreme” pornography, but mainstream pornography is rife with images that sexualise violence, humiliation, and submission that targets women. This is a risk for children, but also for the wider implications that the free spreading of these messages has on society (<a href="#">Tranchese &amp; Sugiura, 2021</a> – evidence of the relationship between mainstream pornography and “extreme” misogynistic groups online is available in this paper). The recent <a href="#">pornography review</a> in the UK also points in the same direction.</p> <p>My second point is about your “other areas of consideration”, especially in relation to sexual exploitation and trafficking. Digital technologies have created significant additional risks for women in the sex trade. One such risks is represented by websites that allow men who buy sex to post public reviews about their experience. These can be used as a tool to threaten or extract consent from women who are financially (and possibly legally) vulnerable. Websites that also publicise these women’s “services” become a sort of “consent by proxy” provider, as punters expect to receive the “services” they booked in advance, a concept that is fundamentally counter to the notion of consent (<a href="#">Tranchese, 2025</a> – evidence of the links between online reviews websites and misogyny).</p>

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<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? – Y / N</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? – Y / N</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? – Y / N</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>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</p>	<p>Confidential? – Y / N</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](mailto:OS-Section54@ofcom.org.uk).