

Consultation response form

Your response

Question	Your response
<p>Question 1: 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We understand that the draft guidance acknowledges that certain forms of online content disproportionately target women and girls, including misogynistic abuse, image based sexual abuse, online domestic abuse</p> <p>We understand the decision to focus on four areas whilst acknowledging other types of harmful content – we believe it is important that the whole range of harmful content is considered.</p> <p>We also welcome the recognition that, whilst the target of misogynistic content is girls, it can also negatively impact or even harm young men and boys so acknowledging this is important and addressing the root cause of the issue is key.</p> <p>However, concerns remain regarding the definition and scope of what is considered to be 'harmful' content as gender-based violence is multifaceted and complex. This complexity may pose a challenge to effective enforcement and over-sight.</p> <p>Whilst research has indicated that banning anonymous accounts has little impact, the guidance may benefit from stronger recommendations on tackling anonymous and bot-driven abuse.</p> <p>It is important that the harm that can be caused by the algorithmic design is addressed. For example, girls get far more body shaming, 'tweakment' and diet content etc. According to the Girlguiding Girls' Attitudes surveys, 23% of girls aged 11-21 years have seen images of influencers or celebrities undergoing cosmetic procedures that have made them consider getting these procedures themselves. Half of the girls surveyed thought there are too</p>

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	<p>many adverts online about losing weight or changing appearance. ‘Skinny jabs’ have recently become very popular and the ASA issued a warning to advertisers late last year.</p> <p>Although eating disorder content is mentioned as being covered in previous proposals, there should be recognition that this is nuanced and can have a hugely negative impact on wellbeing – content doesn’t have to explicitly encourage an eating disorder; it could be ‘advice’ on healthy eating, excessive exercising, body shaming etc.</p> <p>See:</p> <p>https://www.internetmatters.org/hub/research/teen-girls-experiences-of-harm-online/</p> <p>https://www.girlguiding.org.uk/globalassets/docs-and-resources/research-and-campaigns/girls-attitudes-survey-2024.pdf</p>
<p>Question 2: Do you have any comments on the nine proposed actions? Please provide evidence to support your answer.</p>	<p>Confidential? – N</p> <p>While the nine proposed actions are a positive step, they require further strengthening. Overall, the guidance proposes measures that, whilst it sets new standards, it is heavily reliant on voluntary compliance to reach good practice actions which may result in inconsistent implementation across platforms which will inevitably leave gaps in protection. Furthermore, the guidance should make absolutely clear the consequences for platforms failing to implement the foundational steps effectively. Ofcom has noted that it has a range of enforcement tools at its disposal, such as the ability to block a site. However, the effectiveness of such measures, is questionable as public outcry could significantly undermine the impact of these measures¹².</p> <p><u>Specific comments on the action points</u></p> <p>Action 1: We strongly support the suggestion that providers should consult with experts – providers should carefully consider who they speak to (i.e. experts who</p>

¹ BBC (2025). Papua New Guinea Blocks Facebook to ‘limit’ fake news and porn. [Papua New Guinea blocks Facebook to 'limit' fake news and porn - BBC News](#) (Accessed 01.05.2025)

² Centre for International Governance Innovation (2020). The Rise of Platform Bans and why they don’t work. [The Rise of Platform Bans — and Why They Don’t Work - Centre for International Governance Innovation](#) (Accessed 01.05.2025).

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	<p>engage with women and girls on these issues) and also be prepared to put any learning into practice – to not just collate information, but take decisive action based upon it. There are currently too many examples of people reporting content and no action being taken. We also welcome the proposal for providers to create a media literacy-by-design policy.</p> <p>Greater clarity is needed on the roles of AI-driven and human moderation as manual and semi-automated moderation methods have reported limited success³. While the guidance emphasises reliance on automated detection techniques, it does not clearly address the potential for counter posts to be mistakenly flagged or how this can be prevented. Notably, the draft guidance itself previously identified this as an issue (Case study 3). Given this acknowledgement, it would be helpful to understand why the establishment of an oversight mechanism which was recognised as a potential solution, has not been included as a foundational action.</p> <p>Action 2: We agree it's important that survivors' experiences are heard and support this suggestion. Given the challenges mentioned here, this could be incorporated with the suggestion in Action 1 to work with experts who work with survivors to reduce the burden on those under-resourced organisations whilst still ensuring valuable information is shared.</p> <p>Action 3: We agree that sharing information and providing detail would be a positive step, but this must be accessible to users. Any information provided should be easily found, read and understood by users, including young people.</p> <p>Action 4: We strongly support abusability / red teaming and would welcome the good practice steps identified here. Many services are misused therefore identifying (and addressing) unintentional harm would be a positive step. The testing of guard rails, filters, flags, should include Welsh language content as well as English. Consideration should also be given to the use of different lexicons which have variations of potentially unsafe, harmful, offensive, threatening words, noun chunks and</p>

³ Gongane VU, Munot MV, Anuse AD. Detection and moderation of detrimental content on social media platforms: current status and future directions. Soc Netw Anal Min. 2022;12(1):129. doi: 10.1007/s13278-022-00951-3. Epub 2022 Sep 5. PMID: 36090695; PMCID: PMC9444091.

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	<p>terms. Because commercial competition disincentivises sharing between social media companies, OFCOM could help those parties by proactively offering Welsh lexicons under NDA.</p> <p>Action 5: We welcome the suggestion that providers adopt safer default settings and are keen to see providers make changes to settings simpler for users to apply. While safe settings for children are welcomed, many users don't change (or know how to change) settings so it would be beneficial for these protections to apply to all users as a foundational step. Currently, this protection is classified as a good practice step rather than a fundamental requirement. A US based study has shown that one in four stalking victims reported that their stalkers used some form of technology with 10% reporting that GPS location tracking was used to monitor their location⁴.</p> <p>Action 6: Could identity verification be linked to age verification? It would be good to see more about how this might work whilst recognising the valid privacy considerations. Further clarity is needed on the metrics that will be used to measure progress on reducing the circulation of this type of content and the consequences on an individual level for repeat perpetration. A 2023 study suggested that account freezes, suspensions, or bans were the most effective ways to curtail the spread of information⁵.</p> <p>Action 7: We believe it is very important that users, especially young people, are able to control their own experiences – our own youth group told us they'd rather tolerate online harms than not have access to social media. We would like to see recommendations going even further – for example, not just allowing users to change their visibility settings but encouraging or making it easier to do so (linking to nudges in Action 6). We would also strongly support the option for users to be able to curate what they see to give them greater agency. There's considerable feedback that content that is suitable for one person isn't for another so individual users</p>

⁴ Baum et al. (2009) Stalking Victimization in the United States. Bureau of Justice Statistics Special Report. NCJ 224527, 1-15. Washington, DC: U.S. Department of Justice, Office of Justice Programs

⁵ Wasike, B.(2023). You've been fact-checked! Examining the effectiveness of social media fact-checking against the spread of misinformation. Telematics and informatics Reports.

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	<p>need to be able to decide more of the content they see. This includes being both able to promote and hide content according to their own personal choice. Also allowing users to label the language of their own posts and to filter content and advertising by language where possible (in terms of both content category and Welsh language filtering).</p> <p>We strongly encourage signposting to specialist support at any appropriate junctures.</p> <p>Action 8: We strongly support steps to encourage the improvement of reporting and complaints – both in making it easier for users to initially report and also in tracking that to conclusion. We believe enabling users to share incidents from other platforms and offline would offer greater protections and should be encouraged, though we recognise there may be challenges in adopting this across multiple platforms. However, a study by Refuge⁶ demonstrated that more than half of the reports received no response. Whilst the guidance contains foundational steps related to the establishment of a more transparent reporting mechanism as well as an appeals process for content flagged as illegal content, an appeals process, mandatory responses, monitoring and independent oversight for all materials reported would be a welcomed foundational step.</p> <p>Action 9: We support steps to ensure appropriate action is being taken and especially welcome the proposal to encourage fact-checking to counter misinformation. We also support the suggestion to hide content whilst it's under review – this is a good short-term action to demonstrate reports are being taken seriously.</p>
<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?</p>	<p>Confidential? – N</p> <p>The case studies and good practice steps are useful, but there are crucial gaps. A greater emphasis is needed on preventative measures that mitigate gender-based abuse (which is objective 4 of the Welsh Government VAWDASV National Strategy⁷).</p>

⁶ Refuge (2022). Marked as Unsafe. [Marked-as-Unsafe-report-FINAL.pdf](#) (Accessed 10.03.2025)

⁷ [Violence against women, domestic abuse and sexual violence: strategy 2022 to 2026 \[HTML\]](#) | GOV.WALES

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Please provide evidence to support your comment.	
<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>Ofcom's proposed transparency measures are welcomed but additional mechanisms could increase compliance.</p> <p>Whilst we acknowledge that in 1.18 it states 'We urge providers to implement...' we would like to see more compelling language used throughout the guidance.</p> <p>We recognise these are additional actions that providers can choose to take. However, it would be helpful if a form of words could be found that shows that adoption of these actions is strongly encouraged as a demonstration of their commitment to improving online safety. As this currently reads, 'Good practice' sounds very much optional and easy for providers to ignore if they wish which would not be the desired approach.</p> <p>This could also include but are not limited to requiring all platforms to publish gendered abuse statistics and intervention strategies, setting clearer deterrents for non-compliant platforms, encouraging collaboration with gender-based violence rights groups and digital safety advocated to develop best practices.</p> <p>A report on progress is due to be published 18 months after the publication of the final guidance to assess whether companies are making changes, but given how quickly this area is evolving, this timeline is too slow.</p>
<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>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</p>	<p>Confidential? – N</p> <p>We do not think there is enough detail in the draft guidance to determine if the proposals will treat Welsh less favourably than English or if they will have an adverse effect on the Welsh language.</p>

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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.	We have highlighted in the response to question 2 where consideration could be given to the use of the Welsh language in relation to certain proposed actions.

Please complete this form in full and return to OS-Section54@ofcom.org.uk.