

## **Women in Tech Policy response to Ofcom Consultation on draft guidance: A safer life online for women and girls**

### Overview

The Women in Tech Policy Network (WITP) is a network that convenes and promotes women's voices, experiences, and skills in the tech and digital policy landscape. As a network, we provide a space for women in tech policy to connect over work, life, policy, technology and the digital agenda.

As previously agreed, the Women in Tech Policy Network facilitated a discussion on the 19<sup>th</sup> of May, bringing together leading women in tech space to provide insight and expertise on Ofcom's consultation on draft guidance. Please see the below transcript that acts as the Women in Tech Policy Network's response. The below discussion was completed in Chatham House style to facilitate open discussion on this important topic. However, the Women in Tech Policy Network are willing to provide an list of attendees and their organisations as an annex to our consultation response.

### Discussion Summary

The Women in Tech Policy Network discussed our response to Ofcom's consultation on draft guidance: a safer life for women and girls. Key points included the need for effective enforcement of guidelines; the importance of digital literacy and digital citizenship; and the demand for international collaboration to ensure a safer life for women and girls online.

### Transcript

*Transcript Style:* Artificial Intelligence used for initial transcription, and edited by Women in Tech Policy volunteers to ensure anonymity.

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### **Introduction**

Speaker A introduced the session, outlined the scope, and the wider goals of the session. The session was underpinned by the overarching value that all members are on an equal footing and are welcome to contribute any part of their knowledge or expertise.

### **Theme One: Digital Citizenship and Literacy**

Speaker B outlined their passion around introducing Digital Citizenship to demonstrate to people that we expect a certain behaviour from them in online spaces. They noted the clear line on having societal conversations whilst also educating and informing policy.

Speaker D indicated there is a large focus on Digital Literacy in their current area of policy expertise. Focusing on digital literacy, there should be a focus on mitigating the growth of the manosphere and violence against women and girls. They encouraged a focus towards Digital Literacy to try and substitute the gaps we see on platforms for safeguarding and educating children and young people. They also focused on the inequality of access to education and technology that results in disparity across groups resulting in a varying plethora of outcomes.

They used the example of visiting a school to educate them on AI and deep fakes, to which it was apparent that the schoolchildren had not been previously educated on the negatives and dangers of AI. Clear focus on how to tackle the digital divide.

Speaker G highlighted there needs to be a holistic picture for parents, communities, teachers, educators, etc, to show the social landscape that we're living in. They also highlighted that digital literacy is important, yet it should not be disproportionate to enforcement. Enforcement action is necessary to embed safety by design principles across platforms, across Europe and the international space, whilst balancing this with education.

Speaker H further supported the idea of Digital Citizenship, yet raised concerns on who regulates it and how do we gain compliance.

### **Theme Two: Call for Action**

Speaker C indicated concern on how violence against women and girls in the online space plays into the broader violence against women and girls. They highlighted a specific example of the gendered space that exists focusing on AI where 98% of AI generated abuse contains images of girls and women. They indicated that the online space and specifically AI as an example, is a clearly gendered issue. In this regard, they showcased the importance of horizon scanning and clear safeguards to be built into AI technologies.

Speaker E indicated that whilst a plethora of evidence is important, there must be a clear focus on effective enforcement and implementation of promises across the board. The reality is that policy should work so that most companies feel obliged to enforce recommendations. The speaker also raised concern that 18 months is a too long of a timeframe to implement enforcements.

Speaker G stated that the tech sector may not implement things they are not mandated to do, and therefore, recommended policy should go further than just guidance so it is a mandated code within regulation. There must be a clear impact as a result of the guidance published.

Speaker I indicated there is a current disconnect between how individuals act online versus how they act in the face to face manner. Whilst the scope of guidance is around online harms, there is a clear effect on what happens in the real world as well. Women, and there is often a disproportionate impact to intersectional characteristics, are not wanting to place themselves into the political space due to the feeling of being unsafe physically and in the online realm. The two experiences of violence against women and girls - the physical and online - should not be treated in isolation.

Speaker J highlighted further support for effective enforcement. Although some guidance cannot be enforced, there should be a clear code of practice that are integral to guidance to facilitate enforcement. They additionally stated that Ofcom should be able to link guidance to the risk assessments that regulated services have to do under their safety duties. They also suggested the need to go further and faster, essentially implementing results quickly and testing this out with civil society and the relevant organisations to assess the quality of guidance.

Speaker K stated there is an important role for the regulator to play in terms of educating smaller platforms so they match up with the safety protocols and the wider industry standards. On the counter with the large tech organisations, there needs to be a framework provided that shows companies what to do and indicates the potential repercussions of non-compliance. They also flagged there should be an education piece to support parents and boys to understand how quickly

developments in technology are occurring. For example, is there a potential for toolkits for parents and families to support them in the space of technology development and how it impacts their girls.

### **Theme Three: Evidence**

Speaker F indicated that lived experiences should inform policy in this space. Lived experiences can form the path forward and can demonstrate the lifelong consequences of experiencing violence in the online sphere. They stated it's imperative to connect the policy direction to human involvement. However, they indicated that lived experiences should not be in a vacuum so that stories can reflect patterns, providing more powerful impact as evidence.

Speaker G stated there should be a balance between empathetic/person centric research and high quality, scalable research. They also focused that guidance should represent the needs of people who are harmed, including speaking to those who are harmed online to find out what they're looking for, what their needs are, and where they need support.

Speaker H indicated there is a tension and necessary balance to strike between qualitative and quantitative data. From the balanced data point, then we can detail and create an effective intervention strategy that pays attention and takes care of those who are vulnerable.

### **Theme Four: Specific Responses to Guidance**

Speaker D stated the guidance should provide more clarity and demonstrate a tangible point of improvement with a focus on how to operationalise guidance. They also suggested a need for stronger default settings that enforce protections, such as frictions and nudges, that provide control over content. These ideas have already been brought up in this space by multiple different organisations demonstrating these are not new ideas. Yet, there has been little enforcement from previous guidance that enforces action and is not vague.

### **Theme Five: The Global Space**

Speaker G indicated the global online safety regulators network has a role to play in driving best practices across the world and outside of the UK. There must be legislation across jurisdictions, however, it will be challenging to ensure we bring other markets along with us.

Speaker D indicated the potential of an international body that brings together and advocates for guidance and enforcement globally.

### **AOB and Closing Remarks**

Speaker B highlighted that when there are discussions on empowering girls, there should also be a focus on empowering boys and the wider bystanders to speak up in the wider issue on this, and this further links to the point of Digital Citizenship. Speaker B further detailed the importance of the guidance to safeguard women and girls online. They supported the introduction of discourse to facilitate literacy and education on this topic. They questioned the balance between freedom of speech and safeguarding as two principles that should be balanced carefully in the guidance.

Speaker A closed the session and thanked those that attended and contributed to the session.



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