

Your response

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<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? – Y / N</p> <p>Identity verification could potentially help tackle certain issues.</p> <p>This could enable people to engage with verified users or users who are still pseudonymous, though in the age appropriate age range, for instance 18+ or 13+..</p> <p>Platforms set their own rules/codes of conduct in terms of platform behaviours. The ability to distinguish a returning user which has previously been banned could be supported by identity verification or pseudonymised identity, e.g. an 18 plus individual, unnamed, with clean track record.</p>
<p>Question 2: Do you have any comments on the nine proposed actions? Please provide evidence to support your answer.</p>	<p>Confidential? – Y / N</p> <p>Action 4: Conduct evaluations of abuse / abusability alongside product testing.</p> <p>Age or identity verification with e signature at upload could be integrated into testing processes to identify and deter potential misuse routes.</p> <p>Action 5: Set safer defaults</p> <p>Defaults related to interactions or content visibility could be linked to the verification status of accounts.</p> <p>Action 6: Reduce the circulation of online gender-based harms</p> <p>This action directly relates to preventing unwanted /illegal content upload. Age/identity verification with e signature can serve as a deterrent, potentially reducing the likelihood of harmful uploads by reducing disinhibition. Uploader verification (and verification of</p>

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	<p>other people in content), is a technique which can be used to deter intimate image abuse.</p> <p>To put it simply when uploading content I do an e signature asserting that I am over 18 and this is my content which I consent to upload and the others who appear in my content are also asked to prove that they are also over 18 and giving their consent. This can be done with an age or identity verification or age estimation plus buffer.</p> <p>Action 7: Give users better control over their own experiences</p> <p>A relevant good practice step mentioned is allowing users to filter out content from non verified (ie.users <i>without</i> identity verification) should they so choose.</p> <p>Action 9: Take appropriate action when online gender-based harm occurs</p> <p>Preventing banned users from creating new accounts is a good practice under this action. Identity verification could be relevant here.</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? Please provide evidence to support your comment.</p>	<p>Confidential? – Y / N</p> <p>As mentioned above, identity verification could be used as a deterrent & to reduce disinhibition (Action 6) or allowing users to filter content from unverified users (Action 7).</p> <p>Age/identity verification at content upload could protect against intimate image abuse,</p> <p>In terms of an example of good practice that Ofcom could consider, age/identity verification and e-signatures could play a useful role in preventing harmful content from being uploaded or shared in the first place.</p>
<p>Question 4: Do you have any feedback on our approach to encouraging providers to follow this guidance,</p>	<p>Confidential? – Y / N</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>Transparency and spotlighting providers (via the assessment report) could incentivise the adoption of safety measures like age/identity verification with e signature at content upload.</p> <p>Specific good practices and examples of identity verification or pseudonymisation could be included in the assessment criteria to show the role they could play.</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>Confidential? – Y / N</p> <p>Picking up on the potential impacts of age/identity verification discussed in the impact assessments.</p> <p>It would be useful for Ofcom to liaise with the DSIT OFDIA team, digital identity providers and bodies like the Association of Digital Verification Professionals to understand</p> <ol style="list-style-type: none"> 1) how organisations accredited to the UK DIATF meet privacy requirements and comply with data protection law and meet WCAG guidelines for accessibility 2) how digital identity attributes can support inclusion for those without documents - for instance a Yoti digital identity wallet can contain a facial age estimation at 18+, it could contain other attributes such as a PASS card, a company ID, qualifications. Certain verified attributes can provide activity history for someone who does not own or feel comfortable using a government issued identity document, thereby supporting inclusion.
<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 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.