# Your response

# Volume 2: The causes and impacts of online harm

## Ofcom's Register of Risks

| **Question 1:** | |
|---|---|
| i) | Do you have any comments on Ofcom's assessment of the causes and impacts of online harms? |
| Response:<br>One survivor said she gained knowledge from Ofcom's assessments; especially about what grooming is. Another said the information in the presentation was overall helpful and informative. It is very helpful since many platforms nowadays have negative effects. There's a need to be cautious in using those platforms. One survivor said her questions were clarified. She is particularly interested in other people who pose using fake identity to scam people. | |
| ii) | Do you think we have missed anything important in our analysis? Please provide evidence to support your answer. |
| Response:<br>So far, the contents are comprehensive. Although there was no mention of TikTok being too broad or accessible by anyone, i.e., even just a dance video can be downloaded and used by someone else. Many content creators do not even know that they can be already abused or exploited through their contents. Contents on TikTok can be used for profit or attracting more followers. For example, a child was asked to dance by the mother (perpetrator), and this was shared on Facebook. The mother used an alias to upload videos of her child and sell them online. | |
| iii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
| Response: | |

| **Question 2:** | |
|---|---|
| i) | Do you have any views about our interpretation of the links between risk factors and different kinds of illegal harm? Please provide evidence to support your answer. |
| Response:<br>One survivor knew someone whose facial photo was used and attached to a probably computer-generated nude body of a woman, then it was circulated online to her friends through Facebook Messenger. She was shocked but was able to report this incident and sought help from her social worker. The account involved was taken down by Facebook.<br>It is scary and unsafe (Facebook) since anyone can take photos of you and share this in any account they created online. For example, in a page called 'Filipino Cupid', there are lots of foreigners searching for women—this is like a dating site. A survivor shared that she and some of the people she knows were shocked to know that their images were shared on that website. | |

| ii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
| --- | --- |
| | |

# Volume 3: How should services assess the risk of online harms?

## Governance and accountability

| **Question 3:** | |
|---|---|
| i) | Do you agree with our proposals in relation to governance and accountability measures in the illegal content Codes of Practice? |
| Response: | |
| ii) | Do you think we have missed anything important in our analysis? Please provide evidence to support your answer. |
| Response: | |
| iii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
| Response: | |

| **Question 4:** | |
|---|---|
| i) | Do you agree with the types of services that we propose the governance and accountability measures should apply to? |
| Response: | |
| ii) | Please explain your answer. |
| Response: | |
| iii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
| Response: | |

| **Question 5:** | |
|---|---|
| i) | Are you aware of any additional evidence of the efficacy, costs and risks associated with a potential future measure to requiring services to have measures to mitigate and manage illegal content risks audited by an independent third-party? |
| Response: | |
| ii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
| Response: | |

| **Question 6:** | |
|---|---|
| i) | Are you aware of any additional evidence of the efficacy, costs and risks associated with a potential future measure to tie remuneration for senior managers to positive online safety outcomes? |
| Response: | |
| ii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
| Response: | |

## Service's risk assessment

| **Question 7:** | |
|---|---|
| i) | Do you agree with our proposals? |
| Response: | |
| ii) | Please provide the underlying arguments and evidence that support your views. |
| Response: | |
| iii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
| Response: | |

***Specifically, we would also appreciate evidence from regulated services on the following:***

| **Question 8:** | |
|---|---|
| i) | Do you think the four-step risk assessment process and the Risk Profiles are useful models to help services navigate and comply with their wider obligations under the Act? |
| Response: | |
| ii) | Please provide the underlying arguments and evidence that support your views. |
| Response: | |
| iii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
| Response: | |

| **Question 9:** | |
|---|---|
| i) | Are the Risk Profiles sufficiently clear? |
| Response: | |
| ii) | Please provide the underlying arguments and evidence that support your views. |
| Response: | |
| iii) | Do you think the information provided on risk factors will help you understand the risks on your service? |
| Response: | |
| iv) | Please provide the underlying arguments and evidence that support your views. |
| Response: | |
| v) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
| Response: | |

## Record keeping and review guidance

| **Question 10:** | |
|---|---|
| i) | Do you have any comments on our draft record keeping and review guidance? |
| Response: | |
| ii) | Please provide the underlying arguments and evidence that support your views. |
| Response: | |
| iii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
| Response: | |

| **Question 11:** | |
|---|---|
| i) | Do you agree with our proposal not to exercise our power to exempt specified descriptions of services from the record keeping and review duty for the moment? |
| Response: | |
| ii) | Please provide the underlying arguments and evidence that support your views. |
| Response: | |
| iii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
| Response: | |

# Volume 4: What should services do to mitigate the risk of online harms

## Our approach to the Illegal content Codes of Practice

| **Question 12:** | |
|---|---|
| i) | Do you have any comments on our overarching approach to developing our illegal content Codes of Practice? |
| Response: | |
| ii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
| Response: | |

| **Question 13:** | |
|---|---|
| i) | Do you agree that in general we should apply the most onerous measures in our Codes only to services which are large and/or medium or high risk? |
| Response: | |
| ii) | Please provide the underlying arguments and evidence that support your views. |
| Response: | |
| iii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
| Response: | |

| **Question 14:** | |
|---|---|
| i) | Do you agree with our definition of large services? |
| Response: | |
| ii) | Please provide the underlying arguments and evidence that support your views. |
| Response: | |
| iii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
| Response: | |

| **Question 15:** | |
|---|---|
| i) | Do you agree with our definition of multi-risk services? |
| Response: | |
| ii) | Please provide the underlying arguments and evidence that support your views. |
| Response: | |
| iii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
| Response: | |

| **Question 16:** | |
|---|---|
| i) | Do you have any comments on the draft Codes of Practice themselves? |
| Response: | |
| ii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
| Response: | |

| **Question 17:** | |
|---|---|
| i) | Do you have any comments on the costs assumptions set out in Annex 14, which we used for calculating the costs of various measures? |
| Response: | |
| ii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
| Response: | |

## Content moderation (User to User)

| **Question 18:** | |
|---|---|
| i) | Do you agree with our proposals? |
| Response: | |
| ii) | Please provide the underlying arguments and evidence that support your views. |
| Response: | |
| iii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
| Response: | |

## Content moderation (Search)

| **Question 19:** | |
|---|---|
| i) | Do you agree with our proposals? |
| Response: | |
| ii) | Please provide the underlying arguments and evidence that support your views. |
| Response: | |
| iii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
| Response: | |

## Automated content moderation (User to User)

| **Question 20:** | |
|---|---|
| i) | Do you agree with our proposals? |
| Response: | |
| ii) | Please provide the underlying arguments and evidence that support your views. |
| Response: | |
| iii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
| Response: | |

| **Question 21:** | |
|---|---|
| i) | Do you have any comments on the draft guidance set out in Annex 9 regarding whether content is communicated 'publicly' or 'privately'? |
| Response:<br>One survivor said that contents that are supposedly private or not easily shareable by the recipient can also be communicated publicly. For example, a user records content on his/her laptop, that's beyond private sharing and considered as public already | |
| ii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
| Response: | |

***Do you have any relevant evidence on:***

| **Question 22:** | |
|---|---|
| i) | Accuracy of perceptual hash matching and the costs of applying CSAM hash matching to smaller services; |
| Response: | |

| | |
|---|---|
| ii) | Please provide the underlying arguments and evidence that support your views. |
| Response: | |
| iii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
| Response: | |

| **Question 23:** | |
|---|---|
| i) | Ability of services in scope of the CSAM hash matching measure to access hash databases/services, with respect to access criteria or requirements set by database and/or hash matching service providers; |
| Response: | |
| ii) | Please provide the underlying arguments and evidence that support your views. |
| Response: | |
| iii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
| Response: | |

| **Question 24:** | |
|---|---|
| i) | Costs of applying our CSAM URL detection measure to smaller services, and the effectiveness of fuzzy matching for CSAM URL detection; |
| Response: | |
| ii) | Please provide the underlying arguments and evidence that support your views. |
| Response: | |
| iii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
| Response: | |

| **Question 25:** | |
|---|---|
| i) | Costs of applying our articles for use in frauds (standard keyword detection) measure, including for smaller services; |
| Response: | |
| ii) | Please provide the underlying arguments and evidence that support your views. |
| Response: | |
| iii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
| Response: | |

| Question 26: | |
|---|---|
| i) | An effective application of hash matching and/or URL detection for terrorism content, including how such measures could address concerns around 'context' and freedom of expression, and any information you have on the costs and efficacy of applying hash matching and URL detection for terrorism content to a range of services. |
| Response: | |
| ii) | Please provide the underlying arguments and evidence that support your views. |
| Response: | |
| iii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
| Response: | |

## Automated content moderation (Search)

| Question 27: | |
|---|---|
| i) | Do you agree with our proposals? |

Response:

All survivor participants were not familiar with the term "hashing" or "image hashing".

*Survivors' views on the proposals about CSAM hash matching and CSAM URL detection*:

Hash matching is very helpful for privacy so inappropriate videos and photos will be detected and taken down online. Hash matching can even prevent inappropriate content such as CSAM from being uploaded and circulated online.

At first, one of the survivors had a different understanding of hashing. She thought it's a code needed to access the photo sent by one user to another. But she mentioned how important these Ofcom codes are since many websites nowadays are used to produce and distribute CSAM. She believes that these proposals are all effective in taking down illegal websites.

There are many websites now that are used for CSAM distribution. CSAM URL detection is needed. All the measures (i.e., content moderation, etc.) are useful to remove contents that should not be on the internet.

Sometimes, links are also used to hack people's accounts. It would be helpful if we had technology detecting all URLs that have CSAM contents or other similar inappropriate content.

It was challenging for the survivors at first to understand hashing and hash matching. They were also confused about what CSAM URL detection is. The facilitator tried playing and explaining again the video and survivors were able to understand better.

*What should tech companies do to detect newly produced CSAM?*

Survivors agree that there should be a verified identification for each user in the tech platforms to avoid those who use dummy or multiple accounts to victimize children. This should also verify whether the account user is an adult or a minor. To ensure one account per person, a valid identification must be provided by a user upon signing up. This would also ensure accountability.

Not all parents can monitor their children's internet activity. Therefore, it should be mandatory to validate everyone's identity on all tech platforms. There is still a risk because even identification

| |
|---|
| can be falsified. But it should be a minimum requirement when a person is signing up for an account on tech platforms. |
| ii) Please provide the underlying arguments and evidence that support your views. |
| Response: |
| iii) Is this response confidential? (if yes, please specify which part(s) are confidential) |
| Response: |

## User reporting and complaints (U2U and search)

| **Question 28:** |
|---|
| i) Do you agree with our proposals? |
| Response:<br>All participants agreed on the complaints process.<br>"For UK users, affected persons, and interested persons": this includes all people even beyond the UK as long as they are affected or interested as well. The following are survivors' insights in case those who want to report are not English speakers:<br>However, the three bullet points of process are not fully effective if there are language barriers for those who will report coming from another region in the world. There should be a translator – either a computer-generated (something like AI) translator or an actual support person.<br>Any user who wants to report can ask for help from anyone they know if there are language barriers. But it would be helpful to have a tool ready for them to access for reporting.<br>I think they are able to access even though they are not able to speak English fluently since Ofcom says in the second bullet that it's "easy to access" even for children or people with disability.<br>Promise: Easy to access shall be a button that is clickable and when you open it, a page will show up where you can directly give your comments/complaints. There has to be an option too to attach photo or video as supporting evidence or reference.<br><br>***Actions Services Must Take***<br>Survivors' thoughts on the action services identified by Ofcom:<br>If the content is proven illegal, it must be taken down. The user should know what is right or wrong in using tech platforms. Some inappropriate content might be unintentional so we can also give the users benefit of the doubt. But if proven that content was really meant for harm or illegal, there should be an appropriate action.<br>One survivor agrees with the proposals which aims to do immediate action on illegal contents.<br>One survivor shared an experience about a friend whose Facebook account was banned but did not do anything illegal. It took several days for her to take back her account after it was proved to be following Facebook's guidelines. |
| ii) Please provide the underlying arguments and evidence that support your views. |
| Response: |
| iii) Is this response confidential? (if yes, please specify which part(s) are confidential) |

| Response: |
| --- |

## Terms of service and Publicly Available Statements

| **Question 29:** | |
|---|---|
| i) | Do you agree with our proposals? |
| Response: | |
| One survivor mentioned that she would actually just check the box whenever she sees terms and services since there is a lot of content written on it.<br>All survivors agree with Ofcom's terms of service proposals. | |
| ii) | Please provide the underlying arguments and evidence that support your views. |
| Response: | |
| iii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
| Response: | |

| **Question 30:** | |
|---|---|
| i) | Do you have any evidence, in particular on the use of prompts, to guide further work in this area? |
| Response: | |
| ii) | Please provide the underlying arguments and evidence that support your views. |
| Response: | |
| iii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
| Response: | |

## Default settings and user support for child users (U2U)

| **Question 31:** | |
|---|---|
| i) | Do you agree with our proposals? |
| Response: | |
| ii) | Please provide the underlying arguments and evidence that support your views. |
| Response: | |
| iii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
| Response: | |

| **Question 32:** |
|---|

| | |
|---|---|
| i) | Are there functionalities outside of the ones listed in our proposals, that should explicitly inform users around changing default settings? |
| Response: Looks like all the important measures for users under 18 years of age are included in Ofcom's proposals. Can we detect and verify if the user of a platform is 18 years old and above? There are children under 18 years old who do not put their real age when they sign up for a social media account. The proposals mentioned a switched off "automated location information display". Is there a way for companies to still detect children online through their social media accounts in case they are in danger or in need of rescue? | |
| ii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
| Response: | |

| **Question 33:** | |
|---|---|
| i) | Are there other points within the user journey where under 18s should be informed of the risk of illegal content? |
| Response: | |
| ii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
| Response: | |

## Recommender system testing (U2U)

| **Question 34:** | |
|---|---|
| i) | Do you agree with our proposals? |
| Response: | |
| ii) | Please provide the underlying arguments and evidence that support your views. |
| Response: | |
| iii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
| Response: | |

| **Question 35:** | |
|---|---|
| i) | What evaluation methods might be suitable for smaller services that do not have the capacity to perform on-platform testing? |
| Response: | |
| ii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |

| Response: |
|---|

***We are aware of design features and parameters that can be used in recommender system to minimise the distribution of illegal content, e.g. ensuring content/network balance and low/neutral weightings on content labelled as sensitive.***

| **Question 36:** | |
|---|---|
| i) | Are you aware of any other design parameters and choices that are proven to improve user safety? |
| Response: | |
| ii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
| Response: | |

## Enhanced user control (U2U)

| **Question 37:** | |
|---|---|
| i) | Do you agree with our proposals? |
| Response: | |
| ii) | Please provide the underlying arguments and evidence that support your views. |
| Response: | |
| iii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
| Response: | |

| **Question 38:** | |
|---|---|
| i) | Do you think the first two proposed measures should include requirements for how these controls are made known to users? |
| Response: | |
| ii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
| Response: | |

| **Question 39:** | |
|---|---|
| i) | Do you think there are situations where the labelling of accounts through voluntary verification schemes has particular value or risks? |
| Response: | |
| ii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
| Response: | |

## User access to services (U2U)

| **Question 40:** | |
|---|---|
| i) | Do you agree with our proposals? |
| Response: | |
| ii) | Please provide the underlying arguments and evidence that support your views. |
| Response: | |
| iii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
| Response: | |

***Do you have any supporting information and evidence to inform any recommendations we may make on blocking sharers of CSAM content? Specifically:***

| **Question 41:** | |
|---|---|
| i) | What are the options available to block and prevent a user from returning to a service (e.g. blocking by username, email or IP address, or a combination of factors)? |
| Response:<br>For one survivor, she believes that sharers of CSAM should be blocked so that others will be saved from their contents especially the child who is most affected when they grow up.<br><br>PROMISE: For me, to prevent a user from returning to a service, they need to follow due process. For instance, if one's content is detected as CSAM, it should be temporarily banned or closed. After that, an investigation should take place to identify if that content was made for CSAM purposes or was taken unintentionally. If the content was proven to be made for CSAM purposes, then they can permanently delete the content and ban the user, as well as all the accounts (email, username, etc.) linked to that profile. At the same time, we may not know that they're doing the same content on every online platform they use. On the other hand, if the content was unintentional, they can just delete it and warn the user. | |
| ii) | What are the advantages and disadvantages of the different options, including any potential impact on other users? |
| Response: | |
| iii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
| Response: | |

| **Question 42:** | |
|---|---|
| i) | How long should a user be blocked for sharing known CSAM, and should the period vary depending on the nature of the offence committed? |
| Response: | |

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|---|
| They should be blocked permanently because there is always a possibility that they will do this again. There are posts on Facebook that are unintended (e.g., a child was captured without wearing clothes). But there are also intended contents that are CSAM—e.g., photos of children that were taken for sexual purposes.<br>If it was proven that an account was producing and distributing CSAM, they should be blocked or deleted permanently since what they are doing is harmful. That user would probably just create a new account so all in all platforms, all users must be required to submit identification cards so they can be easily tracked and reported. There should be verified registration, so people won't be able to create dummy accounts for CSAM purposes. This measure would also create a safer internet for everyone. |
| ii) Is this response confidential? (if yes, please specify which part(s) are confidential) |
| Response: |

| **Question 43:** |
|---|
| i) What steps can services take to manage this risk? For example, are there alternative options to immediate blocking (such as a strikes system) that might help mitigate some of the risks and impacts on user rights? |
| Response: |
| ii) Is this response confidential? (if yes, please specify which part(s) are confidential) |
| Response: |

## Service design and user support (Search)

| **Question 44:** | |
|---|---|
| i) | Do you agree with our proposals? |
| Response: | |
| ii) | Please provide the underlying arguments and evidence that support your views. |
| Response: | |
| iii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
| Response: | |

## Cumulative Assessment

| **Question 45:** | |
|---|---|
| i) | Do you agree that the overall burden of our measures on low risk small and micro businesses is proportionate? |
| Response:<br>Any service should be compliant whether it is big or small. Being a small service does not imply that they are non-compliant. All services must adhere to their terms of service such as detecting and reporting harmful content.<br>For example, Google Meet – the survivor perceives this platform as a small low risk service.<br>PROMISE: As a social media user, I do agree that the overall burden of both should be proportionate because we can't really predict to what apps/websites they're using. We don't know that some users might use this small low risk service because they perceive that people would think that they only uses this for school purposes. | |
| ii) | Please provide the underlying arguments and evidence that support your views. |
| Response: | |
| iii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
| Response: | |

| **Question 46:** | |
|---|---|
| i) | Do you agree that the overall burden is proportionate for those small and micro businesses that find they have significant risks of illegal content and for whom we propose to recommend more measures? |
| Response: | |

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|---|
| Platforms recommended by survivors that need to have more measures to ensure safety by design:<br>Bigo live – not sure if this is safe but it is currently trending on Facebook. Like Kumu, a user needs a code to join any livestreaming room. Based on survivor's experience, content creators who sign up would immediately get some money. While those who register could have a chance of winning items such as iPhone, etc. There are different types of rooms in Bigo live where users can just enter and join the livestream. There are content creators who stream nude content live. It can be used both for good and bad content – some are using it for their business or selling products.<br>Kumu<br>Snapchat |
| ii) Please provide the underlying arguments and evidence that support your views. |
| Response: |
| iii) Is this response confidential? (if yes, please specify which part(s) are confidential) |
| Response: |

| **Question 47:** |
|---|
| i) We are applying more measures to large services. Do you agree that the overall burden on large services proportionate? |
| Response: |
| ii) Please provide the underlying arguments and evidence that support your views. |
| Response: |
| iii) Is this response confidential? (if yes, please specify which part(s) are confidential) |
| Response: |

## Statutory Tests

| **Question 48:** |
|---|
| i) Do you agree that Ofcom's proposed recommendations for the Codes are appropriate in the light of the matters to which Ofcom must have regard? |
| Response: |
| ii) Please provide the underlying arguments and evidence that support your views. |
| Response: |
| iii) Is this response confidential? (if yes, please specify which part(s) are confidential) |
| Response: |

# Volume 5: How to judge whether content is illegal or not?

## The Illegal Content Judgements Guidance (ICJG)

| **Question 49:** | |
|---|---|
| i) | Do you agree with our proposals, including the detail of the drafting? |
| Response: | |
| ii) | What are the underlying arguments and evidence that inform your view? |
| Response: | |
| iii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
| Response: | |

| **Question 50:** | |
|---|---|
| i) | Do you consider the guidance to be sufficiently accessible, particularly for services with limited access to legal expertise? |
| Response: | |
| ii) | Please provide the underlying arguments and evidence that support your views. |
| Response: | |
| iii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
| Response: | |

Has

| **Question 51:** | |
|---|---|
| i) | What do you think of our assessment of what information is reasonably available and relevant to illegal content judgements? |
| Response: | |
| ii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
| Response: | |

# Volume 6: Information gathering and enforcement powers, and approach to supervision.

## Information powers

| **Question 52:** | |
|---|---|
| i) | Do you have any comments on our proposed approach to information gathering powers under the Online Safety Act? |
| Response: | |
| ii) | Please provide the underlying arguments and evidence that support your views. |
| Response: | |
| iii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
| Response: | |

## Enforcement powers

| **Question 53:** | |
|---|---|
| i) | Do you have any comments on our draft Online Safety Enforcement Guidance? |
| Response: | |
| ii) | Please provide the underlying arguments and evidence that support your views. |
| Response: | |
| iii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
| Response: | |

# Annex 13: Impact Assessments

| **Question 54:** | |
|---|---|
| i) | Do you agree that our proposals as set out in Chapter 16 (reporting and complaints), and Chapter 10 and Annex 6 (record keeping) are likely to have positive, or more positive impacts on opportunities to use Welsh and treating Welsh no less favourably than English? |
| Response: | |
| ii) | If you disagree, please explain why, including how you consider these proposals 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. |
| Response: | |
| iii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
| Response: | |