

## 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:** Overall, the assessment is comprehensive and based on sound evidence from the research literature from varied sources. However, one minor comment on referencing relates to the section titled "4. Introduction to volume 2" on page 2: it would be helpful to know the source of statistics listed here.

Section "6B Causes and risk factors for terrorism offences" is very well laid out and comprehensive, with a necessary warning for readers at the start of this section. In general, all sections are detailed and well supported. However, one particular gap and additional research perspective in these sections is discussed below in part (ii).

- ii) Do you think we have missed anything important in our analysis? Please provide evidence to support your answer.

**Response:** An additional risk factor consideration should be the psychological impact on individual users that may accidentally view graphic or disturbing content. Research shows that content moderators, whose role is to review objectionable content on platforms, are at higher risk of vicarious trauma or secondary traumatic stress, anxiety, depression, and stress (Steiger *et al.*, 2021). Their function is to remove unwanted content that violates platform policy and guidelines. However, as a result, they are at high risk of vicarious trauma and other psychological conditions. Research by Spence *et al.* (2023) highlighted the impact of CSAM on content moderators, which includes intrusive thoughts, cynicism, anxiety, detachment, and avoidance; all symptoms of post-traumatic and secondary traumatic stress. Though individual users may not be exposed to the degree of daily exposure experienced by content moderators, potential risks may be evident with brief exposure. However, it has been found that the impact of prolonged exposure to egregious content for content moderators has been found to be cumulative i.e. increased exposure times with fewer breaks increases risk of vicarious trauma (Pearson *et al.*, 2023).

Much of the research in 6C focuses on the impact of victims exploited in the content, however, does not address the impact on users who may unwantedly be exposed on social media or other platform sources. Research on the impact on content moderators can help inform and assess the psychological risks of exposure. Online users, both adults and children may be exposed to graphic violence, for example, if it is live streamed before content moderators have the chance to take it down in time, which puts them at risk of vicarious trauma, essentially witnessing a traumatic event or situation being experienced by another.

On page 63, paragraph 3, it states that exposure will likely cause distress for adults, and increase desensitisation (6C/121), and also impact children (6C. 123). However, these sections could also be expanded to include the psychological risks of viewing by users. Though the impact on children

is explored better with considerations of impact on anxiety and sleep disturbance in 6C.123, which is helpful.

This is also evident in section “6D Encouraging or assisting suicide or serious Self-harm”: impact of accidentally viewing content and risk of Vicarious Trauma could be expanded in sections 6D.20 & 6D.42.

On a positive note, the psychological impacts and risks of hate offences are highlighted on page 119, with references listed on 6F.17. Finally, in section “6L. Extreme Pornography Offence”, the psychological impact on individuals should also be considered. Though there is not a lot of direct research on this impact, a study of college-age males showed that viewing pornographic content can lead to increased risk of depression, anxiety, and stress (Levin *et al.*, 2012).

**References:**

Levin ME, Lillis J, Hayes SC. When is online pornography viewing problematic among college males? Examining the moderating role of experiential avoidance. *Sexual Addiction & Compulsivity*. 2012; 19(3):168–180.

Pearson, E., Whittaker, J., Baaken, T., Zeiger, S., Atamuradova, F. & Conway, M. (2023). Online extremism and terrorism researchers’ security, safety, and resilience: Findings from the field. <https://voxpol.eu/wp-content/uploads/2024/01/Online-Extremism-and-Terrorism-Researchers-Security-Safety-Resilience.pdf>

Spence, R., Bifulco, A., Bradbury, P. & Martellozzo, E. (2023). The psychological impacts of content moderation on content moderators. *Cyberpsychology Journal of Psychosocial Research on Cyberspace*, 17(4): <https://www.researchgate.net/publication/374008778> The psychological impacts of content moderation on content moderators A qualitative study

Steiger, M., Bharucha, T. *et al.* (2021). The psychological well-being of content moderators, the emotional labor of commercial moderation and avenues for improving support. Conference paper: <https://www.researchgate.net/publication/351417825> The Psychological Well-Being of Content Moderators The Emotional Labor of Commercial Moderation and Avenues for Improving Support

iii) Is this response confidential? (if yes, please specify which part(s) are confidential)
Response: No

**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:** Overall, very thorough and comprehensive analysis, only suggestion is to expand psychological impact to individuals’ unexpectedly exposed to extremist violence, CSAM, suicide

and self-harm due to delayed moderation, based on what we know about the impact on content moderators in the research.

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

Response: No

## 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: **In reference to Annex 7, A4, 4C. Performance targets and Annex 8, A4, 4C.**

**Performance targets**

While we agree that services should set performance targets for content moderation and search moderation functions and track whether they are being met, we are significantly concerned about the impacts of these targets on content moderator wellbeing and subsequently user protection. There is an emotional toll on content moderators associated with performance targets which poses risks to their psychological health and safety and user safety. This point outlines that when setting targets, “*services should balance the need to take down illegal content swiftly against the need to make accurate moderation decision. They should measure their performance against their targets*”. The recommendation negates the potential psychological impact on moderation teams and their knock-on effect on achieving these targets. Work demands including high targets and low job control/autonomy has been cited in the literature as a risk factor for occupational burnout which impacts executive functioning (i.e., working memory, problem solving, reasoning) as well as commitment to the role, thereby potentially impacting how quickly and accurately moderators will be able to remove illegal content and staff turnover (see also Question 18).

Supporting evidence:

- Bakket, Xanthopoulou and Demerouti (2023) citing previous research:
  - “Employees who are constantly exposed to high job demands and/or have insufficient opportunities to recover from work-related effort may develop chronic burnout and respond with dysfunctional behaviors.” (p.390)
  - “[Employees with high levels of burnout] may experience difficulties to concentrate, a decreased ability to cope with stress, emotional instability, sleep disturbances, muscle pain, and dizziness [...] These chronic physical and psychological problems may make it more difficult to deal with fluctuating job demands – including workload and emotional job demands, thus resulting in higher weekly burnout levels.” (p. 393)
- Research by Lemonaki, Xanthopoulou, Bardos, Karademas and Simos (2021) examined whether job burnout relates negatively to employee performance in executive functions and positively to cognitive failures rated by colleagues. Amongst 102 employees and their colleagues, with one year follow-up, they found that occupational burnout prevented



optimal utilization of cognitive resources – namely, cognitive functioning – and therefore, impacted job performance.

- Smout, Simpson, Stacey & Reid (2021) citing previous research:
  - “Low perceived control over work activities and having an excessive caseload is consistently associated with [emotional exhaustion]. [...] Higher [emotional exhaustion] is associated with lower job satisfaction and greater intention to leave one’s job.” (p. 261)

References:

Bakket, A.B., Xanthopoulou, D., & Demerouti, E. (2023). How does chronic burnout affect dealing with weekly job demands? A test of central propositions in JD-R and COR-theories. *Applied Psychology, 72*, 389-410. DOI: 10.1111/apps.12382

Lemonaki, R., Xanthopoulou, D., Bardos, A.N., Karademas, E.C., & Simos, P.G. (2021). Burnout and job performance: A two-wave study on the mediating role of employee cognitive functioning. *European Journal of Work and Organizational Psychology, 30*(5), 692-704. DOI: 10.1080/1359432X.2021.1892818

Smout, M.F., Simpson, S.G., Stacey, F., & Reid, C. (2021). The influence of maladaptive coping modes, resilience and job demands on emotional exhaustion in psychologists. *Clinical Psychology and Psychotherapy, 29*, 260-273. <https://doi.org/10.1002/cpp.2631>

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

Response: No

**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: **In reference to Measure 3, Effectiveness (p. 38)**

Similarly in response to question 16, we have concerns about user safety where performance metrics for content moderators may potentially impact their psychological health resulting in occupational burnout and, consequently, resulting in increased staff turnover. It is evidenced in the literature in reference to adjacent roles (those occupations that are similarly exposed to egregious content such as humanitarian aid workers, newsroom workers, police, and mental health professionals) that the burnout is a mediating factor or direct contributor to staff turnover or turnover intention. Given the necessity for adequate resourcing to manage volumes of illegal

content and the extensive training required in human moderation, high levels of staff turnover will have a significant impact on user safety, particularly in relation to specific languages that do not have robust automated moderation data and/or adequate human moderators.

Supporting evidence:

- A longitudinal study of healthcare professionals including primary care clinicians and staff evidenced that burnout contributed to turnover among primary care clinicians. Maslach Burnout Inventory scores predicted clinician turnover. Low engagement also contributed to staff turnover (Willard-Grace et al., 2019).
- Study conducted with Ghanaian nursing staff considered the relationship between work factors such as nurse-physician relation, staffing and resourcing adequacy, and the mediating effect of burnout on turnover intention. Their findings were that burnout resulting from unsafe work environments impacted nurses' turnover intention (Poku, Donkor, & Naab, 2022).

References:

Poku, C.A., Donkor, E., & Naab, F. (2022). Impacts of nursing work environment on turnover intentions: The mediating role of burnout in Ghana. *Nursing Research and Practice*. <https://doi.org/10.1155/2022/1310508>

Willard-Grace, R. et al. (2019). Burnout and health care workforce turnover. *Annals of Family Medicine*, 17(1), 36-41. Retrieved from <https://www.annfammed.org/content/annalsfm/17/1/36.full.pdf>

ii) Please provide the underlying arguments and evidence that support your views.

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

## 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:	
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;
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Response:

ii) Please provide the underlying arguments and evidence that support your views.
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Response:

iii) Is this response confidential? (if yes, please specify which part(s) are confidential)
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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;;
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Response:

ii) Please provide the underlying arguments and evidence that support your views.
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Response:

iii) Is this response confidential? (if yes, please specify which part(s) are confidential)
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Response:

**Question 25:**

i) Costs of applying our articles for use in frauds (standard keyword detection) measure, including for smaller services;
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Response:

ii) Please provide the underlying arguments and evidence that support your views.
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Response:

iii) Is this response confidential? (if yes, please specify which part(s) are confidential)
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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:

- 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:

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

Response:
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<b>Question 33:</b>
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| i) | Are there other points within the user journey where under 18s should be informed of the risk of illegal content? |
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Response:
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- |     |  |
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| ii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
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Response:
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## Recommender system testing (U2U)

<b>Question 34:</b>
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| i) | Do you agree with our proposals? |
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Response:
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| ii) | Please provide the underlying arguments and evidence that support your views. |
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Response:
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| iii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
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Response:
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<b>Question 35:</b>
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| i) | What evaluation methods might be suitable for smaller services that do not have the capacity to perform on-platform testing? |
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Response:
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| ii) | Is this response confidential? (if yes, please specify which part(s) are confidential) |
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Response:
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***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.***

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

- 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:

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

Response:

***There is a risk that lawful content is erroneously classified as CSAM by automated systems, which may impact on the rights of law-abiding users.***

**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:	
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:	
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

<b>Question 48:</b>	
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:

#### 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

<b>Question 54:</b>	
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:	