

Your response

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<p>Question 1: Do you agree with our proposals in this section? Please explain your reasons and provide any relevant supporting evidence.</p>	<p>Confidential? – N</p> <p>We believe that this section does not go far enough to detail some of the implications and impacts of online discriminatory views. Online discrimination should be viewed as a form of violence, which can be a form of interpersonal violence, and while it begins in online spaces it can also result in embodied harm to the recipients. In addition, violent interactions online not only directly impact recipients but also can harm observers or bystanders (Kavanagh & Mountjoy, 2024).</p> <p>We are pleased to see the focus on women and girls. However, we believe that the scale of the issue could be further reinforced. We advocate for the use of the term online gender-based violence and, due to the levels of discrimination and the impact of this violence, we argue that it should be recognised as a public health crisis. Lesser terms may be in danger of normalising the problem or increasing tolerance for it. Violence aims to provoke fear, emotional or psychological disturbance, distress, alarm, or feelings of inferiority by being lewd, threatening, aggressive, exploitative or manipulative. We also believe that it should be recognised that online gender-based violence can result in the silencing and removal of women and girls in online spaces and thus impacts on their freedom to engage in online spaces, violating their human rights.</p> <p>Evidencing the scale of this issues, in 2015, the United Nations Educational, Scientific and Cultural Organization (UNESCO) published a report titled “Cyber Violence Against Women and Girls: A World-Wide Wake-up Call.” This report documented that almost three quarters of women online have been exposed to some form of violence.</p>

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	<p>Therefore, we would recommend the addition of a specific goal that educates and influences policy relating to the significance of online violence as it can preclude any engagement with media – if women and girls (or other targeted groups online) are not free to participate online then media literacy interventions with these groups will ultimately fail.</p> <p>Kavanagh, E., & Mountjoy, M. (2024). CyberAbuse in sport: beware and be aware! <i>British Journal of Sports Medicine</i>, bjsports-2023-107885. https://doi.org/10.1136/bjsports-2023-107885</p>
<p>Question 2: Do you agree with our proposals in this section for working with platforms? Please explain your reasons and provide any relevant supporting evidence</p>	<p>Confidential? – N</p> <p>While we are in broad agreement with the approach in this section we see a number of challenges. For example. It is important that the burden for staying safe online in not placed on participants as we know that this will then disproportionately impact women and girls, marginalised communities, and those with poor media literacy. Platforms have announced a range of “user empowerment tools” that they claim will allow users to stay safe online, but these measures do not protect many users from harm in the first place. Placing the onus on the subject of violence results in the need for safety work (Kavanagh, Litchfield & Osborne, 2023). This can often involve avoiding spaces and creates fear of crime - restricting liberties and violating human rights as we detail in our answer to 1 above. Organisations have a moral obligation for keeping users safe.</p> <p>While we acknowledge that there are an increasing number of interventions and policies on platforms, we also question the extent to which these policies are upheld and whether they have had tangible impacts. The management of toxic remarks is undertaken by various parties, including the social media platform. However, there remains a lack of effective moderation of violent gender-based comments (Fenton et al., 2024). The absence of comment moderation or removal reinforces an environment supportive of gender-based violence; such exchanges therefore become part of the discourse that is deemed acceptable on these accounts. Protecting women and girls from violence online is therefore a</p>

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	<p>moral obligation and an issue that organisations cannot ignore (Kavanagh & Parry, 2024).</p> <p>Advances in artificial intelligence (AI) now allow platforms to not only delete content that is deemed to be discriminatory but to even block it and to report the user so that recipients do not witness the material and cases can be investigated. This technology can move the onus for online safety away from the individual (Kavanagh, Litchfield & Osborne, 2023), reducing the safety work burden on the intended targets. However, access to such technology remains limited and so greater work is needed to ensure that it is implemented by the platforms at the earliest possible moment.</p> <p>Fenton, A., Ahmed, W., Hardey, M., Boardman, R., & Kavanagh, E. (2023). Women’s football subculture of misogyny: the escalation to online gender-based violence. <i>European Sport Management Quarterly</i>, 1-23. https://doi.org/10.1080/16184742.2023.2270566</p> <p>Kavanagh, E., Litchfield, C., & Osborne, J. (2021). Virtual technologies as tools of maltreatment: Safeguarding in digital spaces. In M. Lang (Ed.), <i>Routledge handbook of athlete welfare</i> (pp. 221–230). Abingdon, OX; New York, NY: Routledge.</p> <p>Kavanagh, E. J., & Parry, K. D. (2024). Protecting women athletes from online abuse is a moral obligation - and an issue sport cannot ignore. <i>Sports Pro Media</i>. (https://www.sportspromedia.com/insights/opinions/womens-sport-online-abuse-social-media/)</p>
<p>Question 3: Do you agree with our proposals in this section? Please explain your reasons and provide any relevant supporting evidence. We are particularly interested in any views and evidence about whether a Media Literacy Week would be impactful.</p>	<p>Confidential? – N</p> <p>Section 4.5 identifies a targeted approach for children with particular characteristics. The list of these characteristics includes special educational needs and disabilities, communication difficulties, experience of care, mental health difficulties and/or physical impairments. As we detail below, we would encourage Ofcom to consider how their interventions will be designed and implemented when the particular characteristics identified intersect with other elements of identity such as gender and sexuality. It is important that interventions are</p>

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	<p>based on research with these groups to understand both the lived experience and also the suitability of any interventions. Our research with these groups has shown the importance of institutional communication and that inclusion efforts must be seen to be authentic.</p> <p>We would support a Media Literacy Week or festival of media literacy. However, in line with our comments above, it would be important that the branding of such an initiative is well thought through to ensure it engages and is understood by target populations.</p>
<p>Question 4: Do you agree with our assessment of the potential impact on specific groups of persons?</p>	<p>Confidential? – N</p> <p>We are in broad agreement with this section. However, it is important to note that the identities that are discussed often intersect to amplify challenges. Our research has found that the risk of experiencing discrimination online is magnified by the intersection of social identities including gender (Kavanagh et al., 2019), race (Litchfield, Kavanagh, Osborne, & Jones, 2018; Cleland, Parry & Radford, 2019), and sexual orientation (Hansen, Kavanagh, Anderson, Parry, & Cleland, 2022). These intersecting identities directly increase the risk of being recipients of discrimination online and can only be understood when examined in multiplicity. Therefore, the priority groups that have been identified should not be considered in isolation. Moreover, it is important to note that discrimination against particular groups does not solely impact on the targets but also by their wider networks and those who witness it.</p> <p>Cleland, J., Parry, K., & Radford, D. (2019). "Perhaps She Only Had a Banana Available to Throw": Habitus, Racial Prejudice, and Whiteness on Australian Football League Message Boards. <i>Sociology of Sport Journal</i>, 36(4), 330-338. https://doi.org/10.1123/ssj.2018-0153</p> <p>Hansen, M., Kavanagh, E., Anderson, E., Parry, K., & Cleland, J. (2023). An analysis of responses on Twitter to the English Premier League's support for the anti-homophobia rainbow laces campaign. <i>Sport in Society</i>, 26(2), 302-316. https://doi.org/10.1080/17430437.2022.2028774</p>

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	<p>Kavanagh, E., Litchfield, C., & Osborne, J. (2019). Sporting Women and Social Media: Sexualization, Misogyny, and Gender-Based Violence in Online Spaces. <i>International Journal of Sport Communication</i>, 12(4), 552-572. https://doi.org/10.1123/ijsc.2019-0079</p> <p>Litchfield, C., Kavanagh, E., Osborne, J., & Jones, I. (2018). Social media and the politics of gender, race and identity: the case of Serena Williams. <i>European Journal for Sport and Society</i>, 15(2), 154-170. https://doi.org/10.1080/16138171.2018.1452870</p>
<p>Question 5: Do you agree with our assessment of the potential impact of our proposals on the Welsh language?</p>	<p>Confidential? – N</p> <p>No comment in this section</p>