

23rd May 2025

Dear Sir,

RE: Consultation: A Safer Life Online for Women and Girls: Practical Guidance for Tech Companies:

The Online Dating and Discovery Association (ODDA) is the global voice for the sector with a mission to create safe, responsible and enjoyable experiences for everyone. Representing over 300 brands, the ODDA works with its members to promote the importance of trust and safety in keeping users safe from harm.

We would like to thank Ofcom for the opportunity to provide a response to the above consultation and include our comments below.

Do you have any comments on our proposed approach to 'content and activity' which 'disproportionately affects women and girls'?

The ODDA and its members agree with the proposed approach to 'content and activity' and the four harms listed within the guidance. We also agree with Ofcom's decision to limit the focus to these four areas within the guidance in order to avoid confusion with other harmful content which is included in the Illegal Content statement and the proposals on Protection of Children.

Do you have any comments on the nine proposed actions? Please provide evidence to support your answer.

Our members take the safety of their users incredibly seriously and have implemented a wide-range of measures as part of a multi-layered safety-by-design approach to trust and safety. This includes dedicated policies and procedures aimed at reducing gender-based harms as well as content moderation. The ODDA therefore agrees with the nine proposed actions and the way they have been set out.

However, we would like to remind Ofcom of the importance of adopting a proportionate and risk-based approach to implementation. The Online Safety Act is one of several major pieces of legislation that firms operating in the UK will need to comply with. Smaller firms in particular, are often disproportionately impacted by having to implement new rules which larger firms are potentially able to absorb more easily. This reduces innovation, investment and ultimately, economic growth.

That said, we welcome the acknowledgement that services can exercise flexibility in the way they comply with the codes, by implementing alternative measures to those set out in the document providing they keep a record of what they have done and how the duties have been met.

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.

We welcome the inclusion of case studies in the guidance and specifically, the important point that implementing the measures set out in the document will also likely benefit other groups at heightened risk of experiencing online harms.

We also welcome the inclusion of additional good practice steps that go beyond the proposed codes and guidance. We think that the offer from Ofcom to facilitate the capture and dissemination of good practice, such as a hub which online services can access to improve or review their own processes, will be welcomed by our members.

Do you have any feedback on our approach to encouraging providers to follow this guidance, 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?

We are encouraging our members to follow the guidance while also raising awareness of the toolkits that Ofcom have created to support providers through the implementation phase.

We also welcome the opportunity to help Ofcom engage with the online dating and social discovery sector more widely to help build a clearer picture of how services are keeping women and girls safe.

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.

We think that the impact assessment should include 'opportunity costs' alongside more traditional costs. We feel this would capture a more accurate reflection of the costs incurred by smaller services in particular.

We look forward to continuing to work with Ofcom in making the internet a safer place for women and girls.

Yours faithfully,



Simon Newman

CEO