

## Your response

**Question 1: To assist us in categorising responses, please provide a description of your organisation, service or interest in protection of children online.**

*Is this a confidential response? (select as appropriate)*

No

Plan International UK is a global children's charity. We work with girls and boys growing up in some of the world's poorest communities, making sure they have access to the education, health care, clean water and future opportunities they need to thrive. We're also working to create a just and equal world for girls – including here in the UK. Through our Because I am a Girl campaign we're standing with brave girls everywhere as they take on the issues that matter to them, from child marriage to street harassment and sexual exploitation at work. We're fighting for a world where every child, especially every girl, knows their value. We want the communities they're growing up in – and the world around them – to value them too. And if a disaster strikes we're there to protect children, keep them learning and help them to recover.

**Question 2: Can you identify factors which might indicate that a service is likely to attract child users?**

*Is this a confidential response? (select as appropriate)*

*[Please select]*

**Question 3: What information do services have about the age of users on different platforms (including children)?**

*Is this a confidential response? (select as appropriate)*

*[Please select]*

**Question 3: What information do services have about the age of users on different platforms (including children)?**

**Question 4: How can services ensure that children cannot access a service, or a part of it?**

*Is this a confidential response? (select as appropriate)*

*[Please select]*

**Question 5: What age assurance and age verification or related technologies are currently available to platforms to protect children from harmful content, and what is the impact and cost of using them?**

*Is this a confidential response? (select as appropriate)*

*[Please select]*

**Question 6: Can you provide any evidence relating to the presence of content that is harmful to children on user-to-user and search services?**

*Is this a confidential response? (select as appropriate)*

No

Plan International's 2020 report *Free to Be Online? Girls and Young Women's Experiences of Online Harassment* ("Free To Be Online?") is based on research conducted across 31 countries (not including the UK) with over 14,000 girls and young women. It aims at uncovering and understanding girls' and young women's experiences of being online on social media platforms: what platforms do they use, what drives their usage, what is their experience of harassment, who are the perpetrators and what is the impact of harassment on them and on their continued usage of social media platforms? *Free To Be Online?* found:

More than half of girls surveyed, from around the world, have been harassed and abused online. Girls are harassed just for being girls and it gets worse if they speak up about issues they care about. Race, sexuality and disability are targeted too. Nowhere feels safe, and for many, online harassment that follows them into their homes, and invades their hearts and minds, is just as frightening, physically and emotionally, as street harassment. The two are interwoven – the result of underlying misogyny that is determined to keep girls and women "in their place." Perpetrators who threaten rape and physical violence, use abusive and sexist language, post manipulated photos and send pornographic pictures are able to remain anonymous and unconstrained; girls are often afraid, begin to restrict what they post and are forced to try and protect themselves.

Across all 22 survey countries, 58 per cent of girls reported that they have personally experienced some form of online harassment on social media platforms, backed up by 15 of the 18 participants in the key informant interviews. There are only minor regional differences: in Europe 63 per cent of girls reported harassment, followed by 60 per cent of girls in Latin America, 58 per cent in the Asia-Pacific region, 54 per cent in Africa, and 52 per cent in North America. Even when girls haven't faced gender-based online harassment themselves, the majority of those who were asked know other girls or young women who have. In the qualitative interviews girls who witnessed online harassment happening to others registered its impact on their own behaviour.

Twenty-three per cent of girls and young women reported that harassment happens on Instagram and 14 per cent on WhatsApp but it is on Facebook that they feel particularly unsafe: 39 per cent of girls reported that they face harassment.

Young women are more likely than adolescent girls to report frequent or very frequent harassment. This is despite the fact that adolescent girls use social media more often. It does not necessarily mean that they are harassed less frequently but possibly that they are less aware of what harassment is than their older peers.

Harassment comes in many different shapes, ranging from threats of physical or sexual violence to racist comments and stalking: of the 58 per cent of girls who reported harassment, 85 per cent said they have experienced multiple types of harassment, only 17 per cent say they have faced only one type and 9 per cent of girls said they have experienced every single type of harassment listed below.

**PERCENTAGE OF GIRLS AND YOUNG WOMEN FACING DIFFERENT TYPES OF HARASSMENT**

**Question 6: Can you provide any evidence relating to the presence of content that is harmful to children on user-to-user and search services?**

- 39% Threats of sexual violence
- 37% Sexual harassment
- 21% Threats of physical violence
- 59% Abusive and insulting language
- 26% Anti LGBTIQ+ Comments
- 29% Racist comments
- 32% Stalking
- 39% Body shaming
- 41% Purposeful embarrassment

Of the girls who have been harassed 47% have been threatened with physical or sexual violence.

Harassment appears to fall into two specific categories:

A. Harassment that girls experience simply for being a girl and for being online. It is unrelated to the content of what she posts and is ubiquitous to girls' experiences of social media use. It gets worse if you are Black, identify as LGBTIQ+ or have a disability.

B. A heightened level of harassment when girls are actively engaged in speaking out online. Activists are attacked for what they are saying and for their outspokenness. Harassers are interacting with the content, with the debates girls and young women are involved in and the issues they raise.

Girls who face harassment simply for existing online reported harassment which was mainly sexual in nature:

- receiving sexual comments or explicit messages, including propositions of transactional sex,
- receiving sexual or explicit photos or images,
- receiving requests to send photos of themselves, including examples of blackmail,
- unauthorised sharing of content and/or demonstrating knowledge of the girl's personal information.

Sexual objectification is very much part of a girl's social media experience, with the way girls are dressed or present themselves online being subject to intense and critical scrutiny.

Unauthorised sharing of content and/or demonstrating knowledge of girls' personal information was an issue for 41 per cent of the girls and young women interviewed. Both are an invasion of privacy and in some cases, harassers knew where the girls lived and had information about their relatives. There was also an example of this happening in a more organised, systematic way, involving multiple harassers and multiple victims, over a sustained period of time rather than as a one-off. The harassment involved an 'underground web page' which randomly posted images of women for its users to cyberstalk. This sort of harassment is particularly frightening as it establishes a link between online and offline harassment and violence and shows how more systematic or networked experiences of online harassment have the potential to create a climate of fear among social media users – affecting not only direct victims but adolescent girls and young women more broadly. It demonstrates also how serious reform is needed, with much more robust security mechanisms put in place.

It is not only sexism, just being a girl, that determines girls' experiences online. Racism is also a driver of harassment, as is identifying as LGBTIQ+ or having a disability. If their appearance, their sexuality, ethnicity, race or disability mark them out, girls and young women are targeted even more relentlessly.

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- 42 per cent of the girls who identified themselves as LGBTIQ+ and had experienced harassment, said that they get harassed because of it.
- 14 per cent of the girls who self-identified as having a disability and had experienced harassment said they get harassed because of it.
- 37 per cent of the girls who identified themselves as from an ethnic minority and had experienced harassment said they get harassed because of it.

Online harassment faced by adolescent girls is not a homogenous experience but parallels the differentiated and intersecting forms of abuse and discrimination girls also face in offline settings: in all regions, disability, race, ethnicity, identifying as LGBTIQ+ increase the harassment girls and young women face just because they are young and female.

Activists attract particular vitriol and attention, especially in relation to perceived feminist or gender equality issues, which provoke considerable backlash and emerged as a significant theme in girls' and young women's discussions of online harassment: 47 per cent of interview respondents reported being attacked for their opinions. They felt that often the aim of the attack was to diminish their credibility and knowledge of an issue or to try and silence them altogether – girls shouldn't speak about certain topics. On social media, as offline, they are expected to know their place.

In November 2022 Plan International UK published *'Everything is racialised on top': Black and minoritised girls' and women's experiences of public sexual harassment in the UK*. This report found:

Public sexual harassment is often reinforced by online harassment, which was frequently experienced by research participants, including on social media. Harassment on social media took many forms, including both direct (e.g., receiving inappropriate and unsolicited graphic messages) and indirect forms (e.g., group chat in which boys and young men discussed what they would like to do to girls and young women in their class sexually). Girls and young women described how online sexual harassment was so common it had become normalised, mundane and unremarkable:

"It's just so normalised, to receive pictures and comments (on social media), it didn't even cross my mind to mention it". Jayai, 21

"It wasn't a big thing in high school for a boy to send a dick pic to a girl, it would just be something everyone would laugh about... but that wasn't okay, those were kids". Aashvi, 21

Studies have documented the rise of online sexual harassment among young people, particularly the rise of unwanted image sharing. Douglass et al. found around two thirds of young women had experiences of online sexual harassment whilst other studies have highlighted the high prevalence and normalisation of unwanted image sharing. Previous Plan International UK research<sup>18</sup> has also documented how girls and young women have described online spaces as sites of risk and anxiety to be navigated in the context of harassment, coercion and bullying. Research has suggested that women and minority youth may be more vulnerable to encountering these types of online behaviours. Online harassment was described as different to offline harassment, due to the unique ways social media facilitates interactions. In particular, girls and young women felt that online harassment somehow came easier to the male perpetrators since they did not

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immediately see the consequences of their actions. The ephemeral nature of some platforms was also felt to contribute to boys' and young men's lack of accountability within these platforms.

"I feel like there is that layer where you can dehumanise someone further, with social media... it is easier for people to do, where in person you see people's emotions and fear". Alicia, 19

"On the internet, people seem to forget that consent exists". Jasmine, 19

In stark contrast to the lack of accountability expressed by the perpetrators of sexual harassment in online spaces, victims described how they would blame themselves for being harassed. This was compounded by the actions of others, who similarly held them responsible for their own harassment.

"I remember a lot of girls being slut shamed, especially if nudes were leaked, that was a whole thing; obviously it is a criminal offence to send pictures around, but the people sending them were not being shamed, just the people in the photos". Sita, 20

**Question 7: Can you provide any evidence relating to the impact on children from accessing content that is harmful to them?**

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No

Plan International's 2020 report *Free to Be Online? Girls and Young Women's Experiences of Online Harassment* ("Free To Be Online?") is based on research conducted across 31 countries (not including the UK) with over 14,000 girls and young women. It aims at uncovering and understanding girls' and young women's experiences of being online on social media platforms: what platforms do they use, what drives their usage, what is their experience of harassment, who are the perpetrators and what is the impact of harassment on them and on their continued usage of social media platforms? *Free To Be Online?* found:

More than half of girls surveyed, from around the world, have been harassed and abused online.

The findings reveal a number of troubling and unacceptable consequences:

- feeling afraid, uncomfortable or unsafe
- feeling upset, anxious or depressed
- feeling guilty or being made to feel in some way responsible for the abuse
  - feeling embarrassed
- feeling vulnerable to further online actions
- feeling like their confidence or ability to express themselves has been affected.

Girls and young women across 22 countries taking part in the research survey said that their experiences of online harassment had resulted in them having lower self-esteem or

**Question 7: Can you provide any evidence relating to the impact on children from accessing content that is harmful to them?**

losing confidence and experiencing mental or emotional stress. Nearly a quarter reported feeling physically unsafe, with others having problems at school, problems with friends or family and in finding or keeping a job.

The research findings also indicate that online harassment has oppressive and disempowering effects that erode girls' confidence, chipping away at their self-esteem and their faith in their own abilities and judgement.

One of the many worrying aspects of online harassment is its effect on girls' and young women's freedom online. Many feel that they should post less, be more careful in what they say and in their use of photos. Some of this is a conscious strategy, some of it less so.

It is clear from the survey results that the more frequently girls experience online harassment the more likely they are to decrease their use of that particular social media platform or to stop using it altogether. Of the girls who have been harassed very frequently, 19 per cent said they use the social media platform less and 12 per cent just stopped using it

Clearly, girls cannot speak freely online:

→ 18 per cent of girls who face very frequent harassment stop posting content that expresses their opinion

→ 16 per cent of girls who face very frequent harassment change the way they express themselves in order to avoid harassment.

Fear for your physical safety, emotional stress, anxiety, reduced self-confidence and being afraid to be outspoken and express what you think and feel means that girls pay a high price for other people's, largely men's, "right" to free speech. They are left to mostly cope on their own with a level of unremitting harassment that would see many of us defeated.

The finding that girls might confront the harasser when they start using social media but then stop doing so because they realise that it doesn't work, is supported by the quantitative analysis: 20 per cent of 15-year-olds said that they challenge the harasser, dropping to 12 per cent of 23-year-olds. It is also apparent that although initially embarrassment or shame may stop a girl confiding in family or friends about the harassment they are experiencing, they come to realise that speaking up and looking for support is important.

Rather than modifying their own behaviour, many girls and young women try to tackle the harassment they experience with technology, though with varying degrees of success. Unfortunately, although reporting and blocking were used most in attempting to combat harassment both proved ineffective. You can block an account but harassers continue to make new accounts across different social media platforms. A significant number of people need to report an account before action will be taken, which makes the procedure almost entirely useless for safeguarding most adolescent girls, who may not be supported by huge numbers of people or may be targeted by one-on-one harassment. As one young woman from Chile observed double standards apply: if you report something – for example sexual harassment – nothing happens, yet if content is posted by the girl featuring a nipple "they will ban you for life." Many girls and young women report that keeping themselves safe online involves a lot of hard work.

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The girls and young women taking part in the research display remarkable resilience. They keep going, motivated often by their passion for a cause but also by the sheer determination not to be driven away. Social media platforms are an integral part of everyday life and they have a right to be there and to be themselves.

**Question 8: How do services currently assess the risk of harm to children in the UK from content that is harmful to them?**

*Is this a confidential response? (select as appropriate)*

*[Please select]*

**Question 9: What are the exacerbating risk factors services do or should consider which may have an impact on the risk of harm to children in the UK?**

*Is this a confidential response? (select as appropriate)*

*[Please select]*



**Question 10: What are the governance, accountability and decision-making structures for child user and platform safety?**

*Is this a confidential response? (select as appropriate)*

*[Please select]*

**Question 11: What can providers of online services do to enhance the clarity and accessibility of terms of service and public policy statements for children (including children of different ages)?**

*Is this a confidential response? (select as appropriate)*

*[Please select]*

**Question 12: How do terms of service or public policy statements treat 'primary priority' and 'priority' harmful content?<sup>1</sup>**

*Is this a confidential response? (select as appropriate)*

*[Please select]*

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<sup>1</sup> See A1.2 to A1.3 of the call for evidence for more information on the indicative list of harms to children.

**Question 13: What can providers of online services do to enhance children's accessibility and awareness of reporting and complaints mechanisms?**

*Is this a confidential response? (select as appropriate)*

*[Please select]*

**Question 14: Can you provide any evidence or information about the best practices for accurate reporting and/or complaints mechanisms in place for legal content that is harmful to children, or users who post this content, and how these processes are designed and maintained?**

*Is this a confidential response? (select as appropriate)*

*[Please select]*

**Question 15: What actions do or should services take in response to reports or complaints about online content harmful to children (including complaints from children)?**

*Is this a confidential response? (select as appropriate)*

*[Please select]*

**Question 15: What actions do or should services take in response to reports or complaints about online content harmful to children (including complaints from children)?**

**Question 16: What functionalities or features currently exist that are designed to prevent or mitigate the risk or impact of content that is harmful to children? A1.21 in the call for evidence provides some examples of functionalities.**

*Is this a confidential response? (select as appropriate)*

*[Please select]*

**Question 17: To what extent does or can a service adopt functionalities or features, designed to mitigate the risk or impact of content that is harmful to children on that service?**

*Is this a confidential response? (select as appropriate)*

*[Please select]*

**Question 18: How can services support the safety and wellbeing of UK child users as regards to content that is harmful to them?**

*Is this a confidential response? (select as appropriate)*

*[Please select]*

**Question 19: With reference to content that is harmful to children, how can a service mitigate any risks to children posed by the design of algorithms that support the function of the service (e.g. search engines, or social and content recommender systems)?**

*Is this a confidential response? (select as appropriate)*

*[Please select]*

**Question 20: Could improvements be made to content moderation to deliver greater protection for children, without unduly restricting user activity? If so, what?**

*Is this a confidential response? (select as appropriate)*

*[Please select]*

**Question 21: What automated, or partially automated, moderation systems are currently available (or in development) for content that is harmful to children?**

*Is this a confidential response? (select as appropriate)*

*[Please select]*

**Question 22: How are human moderators used to identify and assess content that is harmful to children?**

*Is this a confidential response? (select as appropriate)*

*[Please select]*

**Question 23: What training and support is or should be provided to moderators?**

*Is this a confidential response? (select as appropriate)*

*[Please select]*

**Question 24: How do human moderators and automated systems work together, and what is their relative scale? How should services guard against automation bias?**

*Is this a confidential response? (select as appropriate)*

*[Please select]*

**Question 25: In what instances is content that is harmful to children, that is in contravention of terms and conditions, removed from a service or the part of a service that children can access?**

*Is this a confidential response? (select as appropriate)*

*[Please select]*

**Question 26: What other mitigations do services currently have to protect children from harmful content?**

*Is this a confidential response? (select as appropriate)*

*[Please select]*

**Question 27: Where children attempt to circumvent mitigations in place on a service, what further systems and processes can a service put in place to protect children?**

*Is this a confidential response? (select as appropriate)*

*[Please select]*

**Question 28: Other than those covered above in this document (the call for evidence), are you aware of other measures available for mitigating the risk, and impact of, harm from content that is harmful to children?**

*Is this a confidential response? (select as appropriate)*

No

Plan International's 2020 report *Free to Be Online? Girls and Young Women's Experiences of Online Harassment* ("Free To Be Online?") is based on research conducted across 31 countries (not including the UK) with over 14,000 girls and young women. It aims at uncovering and understanding girls' and young women's experiences of being online on social media platforms: what platforms do they use, what drives their usage, what is their experience of harassment, who are the perpetrators and what is the impact of harassment on them and on their continued usage of social media platforms? Free To Be Online? recommended:

It is time for this to stop. Girls and young women are demanding change. Their experiences are not "normal" and girls should not have to put up with behaviour online which would be criminal on the streets. Governments and social media companies must take action. Governments and society as a whole need to monitor this abuse rigorously and social media companies must use their technological skills and financial resources to put freedom online for girls and young women at the heart of their agenda.

Social media companies must:

- Create stronger, more effective and accessible reporting mechanisms specific to online gender-based violence, that hold perpetrators to account and are responsive to all girls' needs and experiences, taking into account intersecting identities (including race and LGBTIQ+ youth).
- Implement their corporate responsibility to respect human rights in line with the UN Guiding Principles on Business and Human Rights.
- Work with girls and young women globally in all their diversity to co-create policy and technical solutions to address and prevent gender-based harassment and violence on social media platforms.
- Strengthen and improve content moderation to identify and remove gender-based violence in a timely fashion, also ensuring that there is parity, proportionality and transparency in their approach to content moderation across the globe.
- Hold perpetrators of gender-based online harassment to account, including by timely

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sanctioning of perpetrators, consistent with other platform violations. • Take responsibility for creating a safe online environment for girls and young women in all of their diversity by initiating discussions on the topic of gender-based online harassment amongst social media users; providing reliable information on the topic to increase awareness, and providing digital citizenship education for all users. • Collect and publish gender and age disaggregated data, in partnership with private entities and civil society, that provide insight into the scale, reach, measurement and nature of online harassment and violence against women and girls and the digital gender divide.

National governments must adopt laws and policies that: • Ensure government policies on internet access are inclusive and actively ensure gender equality in accessing online spaces. This would include creating enabling environments for mobile network operators to enable increased connectivity and mobile internet access. • Update and reform legislative frameworks to deal with online harassment and violence against all girls and young women, bearing in mind specific intersectional characteristics: including, amongst others, race, age, disability, ethnicity, LGBTIQ+. • Enact innovative laws addressing violence against women and girls, holding social media platforms and other third-party internet platforms to account. • Enable the effective implementation, by all relevant government departments – such as the police, the judiciary, and the prosecution services – of laws and policies addressing online harassment of and online violence against all women and girls. • Ensure access to justice for girls and young women who are targeted with online harassment and violence: including promoting awareness of reporting mechanisms, training law enforcement and judicial officers and establishing helplines. • Consult girls and young women in order to understand what their specific requirements are and how to enact the appropriate laws and policies. “And one thing that I really, want to request is that if you can support us...to really come up with the law.” Young woman, 23, South Sudan Ensure appropriate education and awareness raising that: • Requires education departments to develop and deliver digital curricula on how to be safe online; giving students the skills to recognise, avoid and prevent online harassment and violence against women and girls, including the ability to use reporting mechanisms. • Trains government officials on the risks of online violence for girls and how to manage reports of online harassment, including the investigation and prosecution of related crimes. Establish a public health campaign that: • Reaches out to the wider community with information about the impact of online harassment on mental and physical health, including collecting and publishing disaggregated data on online gender-based violence, with a focus on intersectionality. • Operates as a public-private partnership to create awareness and deliver a broad range of support services, including helplines, primarily to girls, but also to their families and communities, with a focus on mental health and self-care.

Civil society, faith-based organisations and other stakeholders • Communities and families must take steps to engage with girls so that they feel secure in talking about online harassment and know that they are supported. • Civil society should develop and deliver digital citizenship education and awareness raising initiatives, so that communities, families and civil society are better informed on the opportunities as well as risks of being online, with a focus on online abuse. • NGOs must facilitate broader discussions on the issue of online harassment and violence, aimed at eliminating gender inequality, harmful gender norms and violence against women and girls. • Mobile network operators must take measures to make mobile internet access more inclusive, with a particular focus on making educational and health-related information and content freely accessible as well as increasing data allowances and lowering costs. • All members of society should



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recognise the harm caused by online harassment and violence against women and girls, stand in solidarity with them and become active bystanders reporting abuse and amplifying girls' voices.