

WARNING: This consultation response contains language and/or material that may be distressing



Ofcom: A Safer Life Online for Women and Girls

**5Rights Foundation
Consultation Response
May 2025**

Overview

5Rights welcomes Ofcom's draft guidance. Since its inception, we have supported efforts to tackle violence against women and girls (VAWG) online and we remain committed to strengthening this work – including through Government strategies¹ and regulatory frameworks. We strongly support the Government's commitment to halving VAWG in a decade,² and the Department for Science, Innovation and Technology's recognition of VAWG as a priority for the regulator as part of its draft Statement of Strategic Priorities on Online Safety.³

The online world is not optional for children. It is where they learn and find information, access entertainment and build and maintain relationships with friends and family. Despite this, digital services and products are not built with their safety, wellbeing or children's rights in mind. Central to this is how service design facilitates and exacerbates harms, including those associated with VAWG. Research demonstrates that children are frequently fed toxic, misogynistic content through recommender systems,⁴ advertised directly to perpetrators of online harm,⁵ and commonly encounter pornography from a young age.⁶

During the passage of the Online Safety Act, 5Rights was proud to help draft the *Violence Against Women and Girls (VAWG) Code of Practice*,⁷ which sets a baseline expectation for what the Ofcom's guidance should require tech companies to do in order to provide adequate protections for women and girls. Although the final version of the Act does not have a standalone duty to protect women and girls from the unique risks they face, the guidance has an important role to play in driving industry change to tackle VAWG online.

¹ 5Rights Foundation (2025) [Written evidence VAWG0053](#), Tackling Violence against Women and Girls (VAWG), Public Accounts Committee

² Home Office & Jess Phillips MP (2025) [Government pledges to protect more women from violence](#)

³ Department for Science, Innovation and Technology (DSIT) & Peter Kyle MP (2024, updated 2025) [Policy paper: Draft Statement of Strategic Priorities for online safety](#), Priority 1 (Safety by design) and Priority 4 (Inclusivity and resilience)

⁴ Regehr, K., Shaughnessy, C., Zhao, M. & Shaughnessy, N. (2024) [Safer Scrolling: How algorithms popularise and gamify online hate and misogyny for young people](#), University College London (UCL) & University of Kent

⁵ National Crime Agency (NCA) (2024) [News: NCA issues urgent warning about 'sextortion'](#)

⁶ Children's Commissioner (2023) ['A lot of it is actually just abuse': Young people and pornography](#)

⁷ Carnegie UK, End Violence Against Women (EVAW) Coalition, Glitch, NSPCC, Refuge, 5Rights Foundation, Professor Clare McGlynn and Professor Lorna Woods (2022) [Violence Against Women and Girls \(VAWG\) Code of Practice](#)

There are many elements of Ofcom’s draft guidance that we welcome, including:

- Recommendations that tech companies work closely with subject matter experts, survivors and victims’ to better understand lived experience;
- Recognition that intersectionality has a role to play in the prevalence and scale of harms on top of those disproportionately faced by women and girls; and
- Proposals for providers of digital services and products to ensure that staff are adequately trained in matters relating to VAWG.

However, given Ofcom’s aim that this guidance delivers an “ambitious vision for women and girls’ online safety”,⁸ there are ways in which the guidance could be strengthened to robustly address the risks faced by women and girls. In particular, Ofcom could go further by:

- Embedding the guidance and its ‘best practice’ measures within the wider regulatory regime, to ensure services deliver meaningful change for women and girls – such as when complying with their core duties under the Act;
- Recognising that service design impacts women and girls disproportionately and including this within its broader approach on the face of the guidance;
- Providing greater clarification regarding companies risk assessing their business models to ensure it accounts for the ways in which its principal goals – to maximise reach, time and activity – intersects with the unique harms to women and girls; and
- Reporting sooner on uptake of the guidance by services so there is a clear, measurable baseline for what the tech sector is already doing to tackle VAWG and where greater action is required.

As an overarching theme, it is important to emphasise that, owing to its status as guidance, the success of the VAWG guidance ultimately depends on having robust codes of practice to underpin it.⁹

Whilst we welcome the relative speed in which the regulator has moved to deliver these codes of practice ahead of schedule, 5Rights – alongside our network– have continued to call for the Act’s regulations to be strengthened.¹⁰ We urge Ofcom to adopt the Children’s Coalition for Online Safety’s recommendations in its *Enforcing the Online Safety Act for Children* report¹¹ in future iterations of the Illegal Harms and Protection of Children Codes of Practice to ensure that this guidance benefits from a stronger foundation that can provide transformational change for all children online – including girls.

⁸ Ofcom (2025) *A safer life online for women and girls: Practical guidance for tech companies*, p. 4

⁹ See: Woods, L. (2023) *Codes, Guidance and the Status of Quasi-Legislation*, Online Safety Act Network and Woods, L. (2025) *Ofcom’s draft guidance on protecting women and girls*, Online Safety Act Network

¹⁰ Children’s Coalition for Online Safety (2025) *Joint Statement on the Children’s Online Safety Regime*

¹¹ Children’s Coalition for Online Safety (2024) *Enforcing the Online Safety Act for Children: Ambitions for the Children’s Safety Code of Practice*

Consultation Response

1. Do you have any comments on our proposed approach to ‘content and activity’ which ‘disproportionately affects women and girls’?

Ofcom has clearly given thought to the specific harms that women and girls face, and the four harms Ofcom has identified – online misogyny, pile-ons and online harassment, online domestic abuse and image-based sexual abuse – provides a good basis for the recommendations in the guidance. We welcome that Ofcom’s explanation of the harms are informed by the views of lived experience individuals and expert research. We also welcome that considerable thought has been given as to how these harms intersect with other protected characteristics.

Below we raise areas where we believe Ofcom’s approach could be strengthened to recognise all the unique risks that women and girls face.

Recognising service design that disproportionately impacts women and girls

Ofcom’s approach must recognise features and functionalities that facilitate and exacerbate harms to, and disproportionately impact on, women and girls. Whilst these are briefly addressed against each harm in the guidance, there should be more explicit recognition that service and system design, for example recommender systems and algorithms, are often responsible for pushing content related to VAWG to both adults and children even where the user has not actively sought it out. Research has found that 6-in-10 boys aged 11-14 are exposed to misogynistic content,¹² with 55% having initially made unrelated searches.¹³ This has a knock-on effect – normalising harmful attitudes to women and girls and leading them to communities predicated on misogyny, such as incel groups. Whilst the guidance makes nods to the importance of considering the impact on boys as a means to tackle VAWG, Ofcom must more address the design-based harms that impacts boys more holistically as part of its approach.

Design features commonly found on user-to-user services, such as filters, affirmation metrics and hashtags can also contribute to VAWG online by normalising certain behaviours, damaging wellbeing and self-esteem, and exposing children to VAWG. 5Rights *Risky by Design*¹⁴ research found that recommender systems trap children in ‘filter bubbles’ of harmful content which reinforces narrow ideals of beauty and contributes to negative body image amongst children, particularly girls.¹⁵ In 5Rights *Pathways*¹⁶ research, which interviewed designers of digital services, developers expressed concern about the impact that beautifying filters are having on children. A survey of girls aged 10-17 conducted by Dove found 80% had applied a filter or

¹² Vodafone (2024) *AI ‘Aggro-rhythms’: young boys are served harmful content within 60 seconds of being online*

¹³ Ibid.

¹⁴ 5Rights Foundation (2020) *Risky-by-Design. Recommender systems*

¹⁵ Wells, G., Horwitz, J. & Seetharaman, D. (2021) *Facebook Knows Instagram Is Toxic for Teen Girls, Company Documents Show*, The Wall Street Journal

¹⁶ 5Rights Foundation (2021) *Pathways: How digital design puts children at risk*, p. 32

retouching app to change the way they looked by age 13,¹⁷ and that girls who distorted their photos are more likely to have low body-esteem than girls who do not.¹⁸ Some services are already taking action on these features. In December 2024, TikTok announced it would restrict access to beautifying filters,¹⁹ such as its “Bold Glamour” filter,²⁰ which dramatically alters facial features. Further, the Institute for Strategic Dialogue’s *Hate in Plain Sight* report suggests that services also give greater prevalence to hashtags perpetrating abuse over non-abusive hashtags.²¹

Ofcom’s approach must also consider design-based risks in specific contexts, notably gaming and virtual reality. This is particularly as Ofcom’s *Media Use and Attitudes*²² research found over half of girls in the UK (58%) play games regularly. Owing to the heightened sensory experiences that children face, particularly in virtual reality environments through haptic technologies that go beyond text and image interactions, this has the potential to intensify feelings of emotional or physical distress – for example if a girl’s avatar is physically assaulted or if a stranger whispers into their ear.

Keeping the approach under review

Whilst Ofcom expects providers to regularly assess new and emerging threats that may impact women and girls,²³ we believe it is also important that the regulator ensures that it updates its guidance in line with any new and emerging risks it identifies – including the addition of new harms beyond the initial four it has already identified. Ofcom must ensure that, by focusing initially on these four harms, it does not disincentivise services to consider other risks which may require a different approach – including new actions.

Other considerations

In addressing potential remaining gaps in its approach with relation to the specific harms that women and girls face, we point to the response by the Suzy Lamplugh Trust regarding how the guidance could better embed stalking as a harm.

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

We welcome that the nine proposed actions reflect safety by design principles more holistically than Ofcom’s codes of practice – a principle pivotal to preventing and

¹⁷ Unilever (2021) *Behind the selfie: reversing the damage of digital distortion*

¹⁸ Ibid.

¹⁹ TikTok (2024) *Updates from our European Safety Forum: strengthening safety for our now 175m-strong European community*

²⁰ Nouril, P. (2023) *Beauty brand Dove is speaking out against the toxic TikTok ‘Bold Glamour’ filter*

²¹ Simmons, C. & Fourel, Z. (2022) *Hate in Plain Sight: Abuse Targeting Women Ahead of the 2022 Midterm Elections on TikTok & Instagram*, Institute for Strategic Dialogue (ISD)

²² Ofcom (2024) *Children and Parents: Media Use and Attitudes Report*, pp. 21-23

²³ Ofcom (2025) *Ofcom calls on tech firms to make the online world safer for women and girls*

protecting women and girls from the risks they face online.²⁴ Whilst we are supportive of the nine actions that Ofcom has identified, the guidance could go further to help create the industry-wide step-change necessary to protect women and girls.

Framing of “foundational steps”

The structure of “foundational steps” and “good practice steps” are intended to illustrate Ofcom’s expectations for service providers in addressing its nine proposed actions – the former drawing on what they *should* already be doing under its Illegal Harms Code of Practice and Protection of Children Code of Practice, the latter on the further measures they could implement to align with the guidance. We accept this structure for the purpose of the guidance is appropriate, but have concerns that “foundational steps” could be interpreted as aspirational for tech companies. This must be rephrased to reflect that services must be meeting the baseline standards set out in the codes of practice.

We refer to the response of the End Violence Against Women (EVAW) Coalition and agree with its recommendation that Ofcom should frame these as “minimum steps”, in order to reflect that these measures are not optional.

Risk assessments

Action 2 requires services to “conduct risk assessments that focus on harms to women and girls.”²⁵ We broadly welcome the risk assessment; however, it would benefit from encouraging tech companies to understand risks unique to women and girls stemming from commercial and corporate business models – which is only briefly addressed in Case Study 4.²⁶

5Rights *Pathways*²⁷ research found that services’ business models are predominantly geared towards achieving three goals – to maximise reach, maximise time and maximise activity on a service. Designers told us that these aims often take precedence and are used to shape the behaviour of people – including children – on services. As such, it is crucial that providers undertake thorough due diligence to assess how these aims intersect or interact with the heightened risks to women and girls.

There are a few ways this could be achieved, for example by encouraging companies to understand how the design of third-party advertising models may be driving harm. Meta whistleblowers Frances Haugen,²⁸ Arturo Bejar²⁹ and, most recently, Sarah Wynn-

²⁴ *Violence Against Women and Girls (VAWG) Code of Practice*, pp. 11-14

²⁵ Ofcom (2025) *A Safer Life Online for Women and Girls: Practical Guidance for Tech Companies*, pp. 22-25

²⁶ *Ibid*, pp. 24-25

²⁷ *Pathways: How digital design puts children at risk*, pp. 23-47

²⁸ Haugen, F. (2021) *Statement of Frances Haugen*, to the United States Committee on Commerce, Science and Transportation Sub-Committee on Consumer Protection, Product Safety and Data Security

²⁹ Bejar, A. (2023) *Written Testimony of Arturo Bejar*, to the United States Senate Judiciary Committee Sub-Committee on Privacy, Technology and the Law

Williams³⁰ have all highlighted how the vulnerabilities of girls were used on its services for clear commercial gain. For example, Wynn-Williams suggested that, if a girl had deleted a selfie, advertisers might see that as a good time to sell beauty products as she may not be feeling confident of her appearance.³¹ The need to thoroughly consider risks stemming from the business model should be expanded upon in Case Study 4.

Supply chains

The guidance could also be strengthened by encouraging providers to map and understand risks posed to women and girls from their supply chains within the risk assessment, so that risks from outsourced elements of a service are considered and mitigations put in place. As noted in the *VAWG Code of Practice*,³² this is important to ensure services take responsibility for all aspects of their service.

Understanding supply chains is also a crucial consideration when evaluating risk of emerging technology – in particular AI. *5Rights Children & AI Design Code*,³³ which was written in conjunction with technical experts, computer scientists and children themselves, explains that understanding AI system supply chains are relevant to current best practice. As AI systems are often built using datasets or models sourced from third parties, understanding supply chains are important to anticipating and mitigating future harms that may occur.

Within the Code, it is recommended providers of AI systems have sufficient visibility to map upstream and onward uses of data used in AI systems, ensuring there are strategies for responding to emerging concerns or incidents (e.g. data contamination). The code also notes that complex or opaque supply chains may increase risks to children. We urge Ofcom to consider these recommendations as part of this guidance.

Product testing

We welcome that the guidance reflects the need for service providers to undertake product testing – particularly as part of the foundational steps for Action 2 (risk assessment)³⁴ and Action 4 (conduct abusability evaluations and product testing).³⁵ Whilst we agree with Ofcom’s suggestion for red teaming to help find vulnerabilities in systems that may be used by perpetrators of VAWG, the guidance could also reflect other models of product testing that evaluate how features, functionalities and service design may be driving risks to women and girls.

³⁰ Wynn-Williams, S. (2025) *Testimony of Sarah Wynn-Williams*, to the U.S Senate Committee on the Judiciary, Subcommittee on Crime and Counterterrorism. See also: Perez, S. (2025) *Meta whistleblower Sarah Wynn-Williams says company targeted ads at teens based on their ‘emotional state’*, TechCrunch

³¹ Ibid.

³² *Violence Against Women and Girls (VAWG) Code of Practice*, pp. 35-36

³³ 5Rights Foundation (2025) *Children & AI Design Code: A protocol for the development and use of AI systems that impact children*, pp. 15-16

³⁴ *A Safer Life Online for Women and Girls: Practical Guidance for Tech Companies*, pp. 23-24

³⁵ Ibid, pp. 33-34

A/B testing with human moderation is a valuable practice which allows teams to test and analyse features and functionalities in a controlled environment, comparing the outcome of a system before and after a change.³⁶ This is important for understanding how changes in the design or inputs of features and functionalities may lead to a higher prevalence of risks, such as misogynistic content or inappropriate contact, with regard to recommender or AI and data-driven systems. Ofcom-commissioned research³⁷ into testing recommender systems suggested A/B tests represented a good trade-off between the insight it provides and its relative ease to conduct for most services.

Resourcing

Ensuring that tech companies provide adequate resource to address harms faced by women and girls is central to delivering safer experiences for women and girls. Whilst we acknowledge that the guidance recognises that service providers often do not allocate enough resources to ensure action is taken with regards to harms faced by women and girls,³⁸ it is important that more clarity is given to make clear that – to meet the actions raised in the guidance – services may need to dedicate extra resource to do so.

For example, one of the potential outcomes of an oversight mechanism for trust and safety (T&S) decisions (a “good practice” step explored in Action 1³⁹) is that there is a lack of adequate resource for those responsible for monitoring and actioning harms specific to women and girls. Indeed, this may be an observation that is flagged by leadership of these Trust & Safety (T&S) teams themselves.⁴⁰

5Rights *Advancing Trust & Safety*⁴¹ report emphasises importance of T&S teams to be appropriately resourced to deal with harms. This extends beyond budgetary and human resources, to ensuring teams have sufficient access to other internal teams – such as engineering, product, and marketing. As the report notes, this collaboration is essential to implementing safety improvements.

Including greater requirements on resourcing in the guidance would also seek to challenge an industry-wide rollback on T&S more generally. Since 2022, tech companies have facilitated have substantial layoffs from their teams. For example, in November 2024, a report by the e-Safety Commissioner⁴² found X (formerly Twitter) had laid off one-third of its global safety team since its acquisition by Elon Musk in October 2022. This

³⁶ Quin, F., Weyns, D., Glaster, M. & Costa Silva, C. (2024) *A/B testing: A systematic literature review*, Journal of Systems and Software, Vol. 211, DOI: <https://doi.org/10.1016/j.jss.2024.112011>

³⁷ Patrnr Analytics & Intelligence (2023) *Evaluating recommender systems in relation to the dissemination of illegal and harmful content in the UK*, p. 38

³⁸ Ibid, p. 56

³⁹ Ibid, pp. 19-22

⁴⁰ 5Rights Foundation (2025) *Advancing Trust & Safety: Systems and standards for online safety professionals*, pp. 41-43

⁴¹ Ibid

⁴² e-Safety Commissioner (2024) *Report reveals the extent of deep cuts to safety staff and gaps in Twitter/X's measures to tackle online hate*

figure included 80% of its safety engineers. More recently in February 2025, Reuters reported⁴³ TikTok had laid-off staff at its T&S unit as part of a restructuring.

3. 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 that Ofcom has opted to use good practice steps and case studies for the purpose of this guidance in setting out additional information as to how companies can protect women and girls online. These are useful resources for setting out the expectations of what services could do to meet their duties.

Evidence thresholds

However, we note that the case studies and best measure recommendations that Ofcom has provided indicative examples of are broadly grounded in existing practices of the tech sector.

In response to Ofcom’s draft *Illegal Harms*⁴⁴ and *Protection of Children*⁴⁵ consultation, we raised concerns that the codes themselves were constrained by a fixation on technical evidence, which is controlled by tech companies. As such, and owing the status of this document as best practice guidance which has the ability to go beyond what is set out in the codes of practice, we would encourage Ofcom to reconsider the level of evidence needed to recommend a step as part of the code to ensure recommendations reflect an outcomes-based approach to addressing harms faced by women and girls.

Ensuring best practice measures and case studies reflect children’s rights and needs

With regard to certain ‘best practice’ measures and case studies, the guidance could include more detail to delineate how services can best meet the steps to meet children’s rights and needs.

For example, Action 1 (ensuring governance and accountability processes address online gender-based harms) makes broad references to accessibility in Case Study 1. Within this example, it would be appropriate to set out in more detail how these terms can be made accessible, age-appropriate and comprehensible to children.

5Rights *Tick to Agree*⁴⁶ research and the technical Institute of Electrical and Electronics Engineers Standards Authority (IEEE SA) 2089-2021 Standard for an Age Appropriate Digital Services Framework⁴⁷ both set out ways in which service providers can design

⁴³ Reuters (2025) [TikTok restructures trust and safety team, lays off staff in unit, sources say](#)

⁴⁴ 5Rights Foundation (2024) [5Rights Consultation Response to Ofcom’s Illegal Harms Code](#), pp. 14-15

⁴⁵ 5Rights Foundation (2024) [5Rights Consultation Response to Ofcom’s Children’s Safety Code](#)

⁴⁶ 5Rights Foundation (2021) [Tick to Agree: Age-appropriate presentation of published terms](#)

⁴⁷ Institute of Electrical and Electronics Engineers Standards Authority (IEEE SA) (2021) [Standard 2089-2021 for an Age-Appropriate Digital Services Framework Based on the 5Rights Principles for Children](#)

their published terms – including terms of service, community standards and privacy policies. This includes using accessible language and concepts that are appropriate and understandable to the age and age-range of the user without the need for an adult, concise, applied in multiple formats and easily navigable. We would suggest these principles are reflected in both case studies with regard to children.

4. 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?

Whilst this guidance provides a strong basis for tackling harms faced by women and girls, its weakness comes from the fact that, as guidance, Ofcom is unable to enforce it in the same way as its codes of practice. As such, there are several suggestions we have to strengthen the take up of the guidance.

Ofcom's assessment of providers addressing women and girls' safety

Whilst we agree with Ofcom's intention to publish an assessment of the guidance, we disagree on its timescale. 2027 is long in the future and risks limiting the measurable impact of the guidance on service's practices.

Being able to track and draw attention to where services could go further will be an important element of driving take up of the guidance. Producing a report earlier to assess the baselines of what services are already doing to tackle harms to women and girls would incentivise services to implement the 'best practice' measures and drive change. As such, Ofcom should aim to publish an interim report between now and 2027 to understand and encourage services to go further.

Embed the guidance within core parts of the regulatory regime

To ensure that services undergo thorough consideration of the guidance, it would be prudent for Ofcom to make reference to the 'best practice' steps throughout the wider regulatory regime – e.g. during risk assessments, transparency reporting, information-gathering and its supervisory relationships. This would help bolster the 'best practice' measures when services implement code of practice measures to comply with core parts of the regime.

Further, within the guidance Ofcom states it “expect services with the highest risk and largest reach to need to do more to ensure they have achieved safer experiences for women and girls.”⁴⁸ As part of this, Ofcom should recommend that these services adopt the 'best practice' measures set out in the guidance as part of their risk assessment duties to mitigate known harms on their services. We urge Ofcom in particular to make clear to providers of these services that the guidance should also be at the front of their mind when complying with the wider regime.

⁴⁸ *A Safer Life Online for Women and Girls: Practical Guidance for Tech Companies*, pp. 7-8

Establish a mechanism to review evidence and shift ‘best practice’ measures to codes of practice

As the regulatory regime develops, it will be important to review not only take up of the guidance’s ‘best practice’ measures but also the evidence base for certain measures. As such, we recommend Ofcom establishes a mechanism that allows for continual review of the evidence so that – once it meets the evidence threshold of the codes – there is consideration of how these can be shifted across. This would assist in embedding the guidance further in the wider regulatory regime.

About 5Rights Foundation

5Rights develops new policy, creates innovative frameworks, develops technical standards, publishes research, challenges received narratives and ensures that children's rights and needs are recognised and prioritised in the digital world. While 5Rights works exclusively on behalf of and with children and young people under 18, our solutions and strategies are relevant to many other communities.

Our focus is on implementable change and our work is cited and used widely around the world. We work with governments, inter-governmental institutions, professional associations, academics, businesses, and children, so that digital products and services can impact positively on the lived experiences of young people.

5Rights is a registered charity. Charity number: 1178581.