

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

**ANTISEMITISM
POLICY TRUST**

Submission to Ofcom's Consultation on draft Guidance: A safer life online for women and girls

March 2025

The Antisemitism Policy Trust is a charity that works to educate and empower parliamentarians and policy makers to address antisemitism. For more than two decades, we have provided the secretariat to the All-Party Parliamentary Group (APPG) against Antisemitism, and provide the secretariat to Lord Mann, the Government's Independent Adviser on Antisemitism. We have been providing Ofcom, DSIT and many other relevant stakeholders with expert advice and evidence relating to online harms and antisemitism.

We welcome the consultation on enhancing the safety of women and girls. We are pleased that intersectionality is referenced and recognised in Ofcom's consultation document - it is the main focus of this submission. We are pleased to note, and support point 2.49 of your document, which states that intersectionality is to be considered in governance and decision-making regarding online harms. We would like reinforce this by explaining the harm caused by intersectional abuse experienced by Jewish women, that is both sexist and racist, why it needs to be acknowledged and how it can be confronted.

There is substantial evidence that antisemitic abuse adversely affects mental health.^{1,2,3} It has been found that people who were targeted by anti-Jewish racism have suffered long term, enduring consequences that mirror emotional responses to other traumatic experiences, including anxiety, aggression, and low self-esteem.⁴ Similarly, studies show that sexist online abuse has both a short-

¹ <https://www.webmd.com/mental-health/health-effects-antisemitism>

² <https://www.womenshealthmag.com/uk/health/conditions/a33506228/anti-semitism-mental-health/>

³ <https://pubmed.ncbi.nlm.nih.gov/36113151/>

⁴ https://www.rcpsych.ac.uk/docs/default-source/members/sigs/spirituality-spsig/kateloewenthallantisemitismanditsmentalhealtheffects.pdf?sfvrsn=79c90f3a_2

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and long-term impact on victims' mental and emotional well-being.⁵⁶⁷ A UN study found that those most likely to experience gendered online abuse, are young women and women, who face multiple forms of discrimination, including on the basis of race.⁸

Jewish women face instances of gendered or sexist antisemitism, meaning antisemitic abuse that is sexualised or is misogynist. This means that beyond suffering abuse that is based on antisemitic stereotypes, Jewish women suffer from abuse that is sometimes based on stereotypes that combine sexism and antisemitism. This abuse includes hostility and harassment, physical and sexual threats, trolling, mockery, inciting others to abuse, the creation and dissemination of deepfake pornographic materials, and more.

A briefing published by the Trust on anti-Jewish misogyny, references a study by the American NGO Media Matters, which found a shocking 180% increase in posts containing both antisemitism and misogyny on the far-right anonymous message board 4chan between 2015 and 2017.⁹ A more recent study we produced with Hope not Hate found that on Telegram, antisemitism and misogyny could provide an 'on-ramp' for the other forms of discrimination.¹⁰ When it comes to the mental health price of this form of intersectional abuse, a study of Jewish women in Canada compared the effects of antisemitism and sexism on the prevalence of depression in women. It found that antisemitic abuse had a considerably greater correlation with depression than encountering sexism.¹¹

The effects of intersectional abuse go beyond harm for the individual victim and have broader implications. It could affect women's willingness to participate in the democratic process, creating a barrier that impacts their equality and representation. For example, female parliamentarians from

⁵ <https://academic.oup.com/bjc/article/57/6/1462/2623986?login=false#97790378>

⁶ <https://steptogether.nsw.gov.au/violent-extremism/mental-health-and-violent-misogyny-online.html>

⁷ <https://www.youngwomenstrust.org/media-centre/sexism-linked-to-higher-rates-of-depression-in-young-women/>

⁸ <https://www.unwomen.org/en/articles/faqs/digital-abuse-trolling-stalking-and-other-forms-of-technology-facilitated-violence-against-women#:~:text=A%20UNESCO%20study%20found%20that,parliamentarians%20had%20experienced%20online%20attacks.>

⁹ <https://antisemitism.org.uk/wp-content/uploads/2020/06/Web-Misogyny-2020.pdf>, p.4.

¹⁰ <https://antisemitism.org.uk/wp-content/uploads/2021/09/Antisemitism-and-Misogyny-Overlap-and-Interplay.pdf>

¹¹ <https://www.sciencedirect.com/science/article/abs/pii/S0277539503001614>

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minority groups, face more online abuse than their male counterparts and may as a result choose to avoid or step down from public office. We have published on the specific hatred for Jewish women MPs in the past. Our report includes details about how both former MPs and now peers, Baroness Berger and Baroness Hodge have received repeat abuse online.¹² So too have other Jewish parliamentarians including Charlotte Nichols MP and Baroness Anderson. Reduced participation and representation of women in our democracy has broader societal repercussions.

Repeated harassment of a group based on multiple aspects of their identity can undermine a sense of safety and heighten anxiety. This, in turn, can have wider social consequences by deepening feelings of isolation – in this case, among women and girls, potentially leading them to withdraw from community participation—particularly when the abuse comes from within their own social circles.

Sexist abuse has become so widely prevalent, over many years,¹³ that it is at risk of being normalised. This in turn will place women and girls at even greater risks, and undermine our key liberal societal norms of equality, non-discrimination, respect and tolerance. For Jewish women, who already belong to a minority group, the effect could be even greater. The normalisation of sexism and discrimination of women also has a negative effect on men, who risk being radicalised into misogynistic beliefs.

We agree with the proposed actions set out in the consultation guide. However, to effectively address the intersectionality of online abuse, we would like to offer additional recommendations:

1. Comprehensive risk assessments: Action 2 in your guide sets out the need for risk assessment. We would like to add a requirement to conduct detailed risk assessments that consider how different forms of hate speech and abuse—such as misogyny and antisemitism—intersect and disproportionately affect certain user groups. This is based on evidence that women who belong to a minority group are more likely to face abusive online behaviours.

2. Inclusive content moderation policies: Encourage the development and enforcement of content

¹² <https://antisemitism.org.uk/wp-content/uploads/2020/06/APT-Google-Report-2019.1547210385.pdf>

¹³ <https://academic.oup.com/bjc/article/57/6/1462/2623986?login=false#97790426>

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moderation policies that explicitly recognise and address intersecting abuses. This includes training moderators to identify and act upon content that targets users based on multiple aspects of their identity.

3. User empowerment tools: We support the reporting mechanisms referred to in Action 8, and would like to add that platforms should provide users with tools to report and manage abuse that accounts for intersectionality. Platforms should facilitate reporting mechanisms that allow users to specify multiple grounds of discrimination, ensuring a more tailored and effective response.

4. Collaboration with affected communities: We would like to add to your suggestion under Action 2, engaging with survivors and victims, and to part 5 ‘supporting women and girls’, that platforms should also engage with communities that are disproportionately affected by intersecting abuses, for example, Jewish women's organisations, to inform policy development and platform design. This collaboration ensures that the measures implemented are both effective and sensitive to the needs of those most impacted, and can help provide them with tailored support.

5. Transparency and accountability: Mandate regular transparency reports from online platforms detailing how they address intersecting forms of abuse, including metrics on the prevalence of such content and the effectiveness of their moderation efforts.

By incorporating these recommendations, users can be better protected from complex forms of online abuse, ensuring safer digital spaces for all, particularly those at the intersection of multiple marginalised identities.