

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



**Ofcom Online Safety Group**

By email

23 May 2025

**APCC position on Ofcom Consultation on draft guidance: A safer life online for women and girls.**

I am pleased to respond to the recent **Ofcom consultation on draft guidance: A safer life online for women and girls**. This submission has drawn upon the views of Association of Police and Crime Commissioners (APCC) members but stands as a response from the APCC Joint National Victims' Lead.

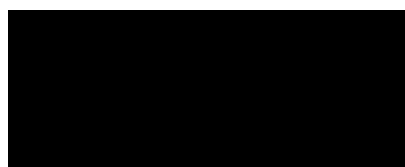
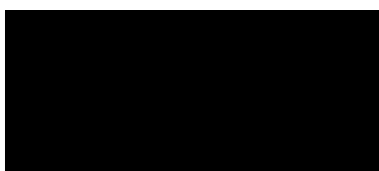
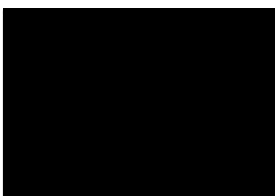
The APCC is the national membership body of Police and Crime Commissioners, Police, Fire and Crime Commissioners, Deputy Mayors for Policing and Crime and other police governance bodies in England and Wales (PCCs). The APCC supports PCCs to fulfil their statutory roles and deliver their priorities in their local policing areas, while providing national leadership and driving strategic change across policing, criminal justice, and the wider community safety landscape, to help cut crime and keep communities safe.

I have focused on the four proposed areas of harm, reflections on the proposed actions and the role of law enforcement.

I broadly agree that the four identified harms (online misogyny, pile-ons/online harassment, online domestic abuse and image-based sexual abuse) are key crime types that have a detrimental impact on women and girls. Whilst it is positive to see crimes such as stalking included under 'online domestic abuse', it would be a mischaracterisation of all victims of stalking. Stalking arising in other, non-domestic situations may be missed if defined under domestic abuse. PCCs are doing crucial work to ensure non-domestic stalking services are accessible to victims. PCCs are continually working with our local communities to improve understanding and identification of these crimes. It is important to be mindful of this and clear on the messaging to service providers.

PCCs are concerned about the use of Artificial Intelligence (AI) and the emergence of new technology to perpetrate crimes against women and girls. For example, a key area that presents a real challenge for law enforcement is the Metaverse. Content is user-generated, with interactions occurring within virtual reality or synthetic physical environments enhanced by augmented reality.

Multiple criminal opportunities within the Metaverse have been found. Such as Child Sexual Abuse (CSA) material, child grooming, investment scams, hate crime, harassment, and radicalisation. For example, in January 2024, the public was made aware of an investigation into the first report of gang rape in the Metaverse. A girl under 16-years-old said she was attacked while playing a virtual reality game. Although not physically injured, she is said to have been left



'distraught' after her avatar — or digital character — was assaulted by several adult men in a virtual 'room'.

The Metaverse is particularly attractive to children who may be vulnerable to online dangers such as exploitation, cyberbullying and exposure to inappropriate content. Metaverse-like gaming platforms are already extremely popular with children, some with [66.1 million daily active users](#). I am keen to see references to emerging threat types and how providers will horizon scan to protect women and girls from current and projected threats.

I welcome the actions for service providers proposed within the draft guidance and have identified five actions that I believe are pertinent to PCCs and law enforcement.

- **Action 2: Service providers must conduct risk assessments that focus on harms to women and girls.** I agree with the good practice identified that service providers should use external assessors, engage with survivors and victims, and conduct user surveys. As PCCs we are in the unique position of supporting and giving victims a voice. We would encourage further dialogue between service providers and PCCs to ensure victims' voices are engaged.
- **Action 3: Be transparent about women and girls' online safety.** This primarily relates to publishing reports requested by Ofcom. PCCs and law enforcement could benefit from an understanding of these reports, where they may focus on certain issues, measures or successes that service providers are seeing, to support potential targeting of resources and focus.
- **Action 4: Conduct abusability evaluations and product testing** where providers are encouraged to test and pre-empt how products and systems can be misused. I welcome the mention and reference to deepfakes. A key concern is deepfake pornography, which is by far the most prevalent kind of deepfake currently being created and circulated. The damaging effects of deepfake pornography have already affected a significant number of women. Whilst this may be addressed in other guidance, I think it is important to stress that there is a real concern for AI-generated child abuse images and AI-generated images for sextortion.

More broadly, when considering prevention, the guidance is heavy on technical solutions but very limited on how service providers can and should play an active role in providing the public with accessible awareness on using the online space safely. PCCs could support key service providers with this messaging where appropriate.

- **Action 8: Enable users who experience online gender-based harms to make reports.** I agree that the reporting and complaints system must work for its users and open a clearer dialogue between women and girls and service providers. The discussion of including a 'trusted flagger' programme is welcome to ensure victims feel heard and their reports are taken seriously. PCCs have reflected that victim service caseworkers often lack the expertise and the ability to collaborate with corporate companies like Google and Meta to effectively advocate for service users. I would encourage further consideration on how expert organisations, such as those specialised in domestic

abuse and stalking, can step into this role. However, I am aware that it comes with significant cost and training to ensure a standardised approach. As mentioned in the draft guidance, there are significant operational challenges for both service providers and organisations designated as trusted flaggers.

- **Action 9: Take appropriate action when online gender-based harms occur.** Whilst the ‘strike-based enforcement polices’ are a positive first step to ensure serial perpetrators are held accountable for their actions, I do not believe this goes far enough. Accounts and individuals who are flagged to perpetrate online gender-based crimes, should have their accounts suspended pending further investigation. Based on the severity of the situation, there should be measures for providers to escalate to law enforcement where necessary. There is also merit in connecting and working with the National Centre for VAWG and Public Protection to ensure perpetrator identification and law enforcement pathways are robust.

As the APCC Joint Victims’ lead, I am a key member of the VAWG Strategy Advisory Group. I am keen to ensure that the Ofcom draft guidance speaks to the national Strategy and vice versa, and I would be happy to raise this in my capacity as a member. I believe there is a key role for Ofcom to work with government bodies to shape communications campaigns where online safety is a focus.

As with previous consultation responses, we would like to further reinforce the point that there should be more consideration of the role of law enforcement, which includes the APCC and National Police Chiefs’ Council (NPCC) within Ofcom’s guidelines. We believe that Ofcom should take a leading role in bringing law enforcement, technology companies and other relevant partners together to galvanise action. We would be keen to work with Ofcom to support this.

Best wishes,

A handwritten signature in blue ink that reads "Clare Moody". The signature is written in a cursive style and is underlined.

**Clare Moody**

PCC for Avon and Somerset  
APCC Joint Lead for Victims

Your response

Question	Your response
<p><b>Question 1:</b> Do you have any comments on our proposed approach to 'content and activity' which 'disproportionately affects women and girls'?</p>	<p>Confidential? – N As above</p>
<p><b>Question 2:</b> Do you have any comments on the nine proposed actions? Please provide evidence to support your answer.</p>	<p>Confidential? – N As above</p>
<p><b>Question 3:</b> 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.</p>	<p>No</p>
<p><b>Question 4:</b> 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?</p>	<p>No</p>
<p><b>Question 5:</b> 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.</p>	<p>No</p>
<p><b>Question 6:</b> Do you agree that our draft Guidance is likely to have positive effects on opportunities to use Welsh and treating Welsh no less favourably than English? If you disagree, please explain why, including how you consider the draft Guidance could be revised to have positive effects or more positive effects, or no adverse effects or fewer adverse effects on opportunities to use Welsh and treating Welsh no less favourably than English.</p>	<p>N/A</p>

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