

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

CARE RESPONSE TO OFCOM CONSULTATION: A Safer Life Online for Women and Girls

INTRODUCTION TO CARE

1. CARE (Christian Action Research and Education) is a well-established mainstream Christian charity providing resources and helping to bring Christian insight and experience to matters of public policy and practical caring initiatives. CARE worked extensively with MPs and Peers during the passage of the Online Safety Act 2023 (OSA) and played a similar role during the debates on Part 3 of the Digital Economy Act 2017.

SUMMARY OF RESPONSE

2. CARE welcomes the guidance and the ambition of Ofcom to ensure that women and girls are better protected from violence online. While the guidance is wide ranging in scope, we have confined our response to the issue of pornography and how it contributes to violence against women and girls (VAWG) online. We urge Ofcom to ensure that the harms of pornographic content are dealt with more prominently in the guidance.
3. We recommend that pornography be addressed within its own standalone section of the guidance. This will better ensure that online platforms take the appropriate action on pornographic content to address VAWG. This standalone pornography section should address specific categories of pornography which are particularly harmful, such as: non-fatal strangulation, incest, step-incest and age play.
4. However, CARE is concerned that the guidance will only be effective if it is rigorously enforced. The guidance affords a large amount of discretion to online platforms. Given that history has proven platforms are unwilling to change, and commercial interest often takes precedence over safety, the guidance needs to be more prescriptive to ensure platforms comply.
5. This response is not confidential.

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

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

PORNOGRAPHY AS PRIMARY PRIORITY CONTENT

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

6. CARE supports the strong focus the guidance places on violence and harm caused to children through pornographic content online. Given pornography is primary priority content under the provisions of the OSA, the guidance rightly identifies the harm to children and the subsequent violence to girls resulting from the consumption of pornography.
7. CARE is, however, concerned that the focus of the guidance is predominantly on pornography as primary priority content and this focus **ignores the totality of harm caused by pornographic content**. We are concerned that this narrow focus of the guidance, if not addressed, will be a barrier to tackling the root of the harm that pornography causes, and it will continue to fuel VAWG, both online and offline. CARE would recommend that, given the seriousness of harm caused by pornographic content, it should be afforded a standalone category in the guidance.

PORNOGRAPHY AS A SEPARATE CATEGORY OF HARM

8. In her review of pornography regulation, Baroness Bertin noted that *“with [the] volume and variety [of pornographic content] has come violence – lots of it. Home pages of many mainstream pornography sites display content that nobody could deny is sexually violent. Video titles regularly include words such as ‘attack’, ‘kidnap’, ‘force’, ‘violate,’ and ‘destroy’.*¹ In Baroness Bertin’s view, violence has become so routine in pornographic content, that even if that content is legal, it is VAWG. Therefore, if VAWG is to be effectively tackled online, violent, misogynistic and harmful content, that may be legal but is harmful, needs to be addressed. **The guidance fails to fully reflect the harm that pornographic content causes.**
9. Finding violent pornographic content online is not difficult. This type of content is not hidden on the dark web or restricted to one small corner of social media. It is found in plain sight on the landing pages of the main pornographic websites and social media platforms. One study found that 12% of titles offered to a first-time user on a landing page of mainstream pornography sites was violent.² Another study found that 13% of the most watched content online was violent, of which 9% was clearly non-consensual violence.³
10. While physical violence is prevalent in pornography, the language used about women further promotes dehumanising and misogynistic behaviour. While pornography did not create violent language against women *“pornography has drawn on and added to it, and, thanks to the ubiquity of the internet this imagery has spread beyond its sphere escalating [the] “pornification” of society..... The accessibility, affordability, and anonymity of pornography viewed through the internet, particularly*

¹ Baroness Bertin *“Creating a Safer World - the Challenge of Regulating Online Pornography”*, February 2025 pg. 8

² Vera-Gray, F., et al. (2021). *Sexual violence as a sexual script in mainstream online pornography*. British Journal of Criminology. Volume 61, Issue 5, September 2021, Pages 1243–1260

³ Shor, E. and Seida, K. (2021). *Aggression in Pornography: Myths and Realities*. In: Research in Sexualities. Routledge: Oxford.

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

“gonzo” pornography “which depicts hard-core, body-punishing sex in which women are demeaned and debased” have exacerbated the normalization of the dehumanization of women.”⁴

11. A Government review of pornography and sexual attitudes and behaviours in 2021 found *“There is substantial evidence of an association between the use of pornography and harmful sexual attitudes and behaviours towards women.”* The report found that viewing pornography was more likely to result in women being viewed as sex objects, promote sexual aggression, shape sexual expectations and result in violent acts and language being used against women.⁵ Last year a study found that men who view violent pornography are more likely to accept ‘harmful sexual myths’ about rape, hostility to women, psychopathy and display harmful emotional regulation.⁶ Evidence highlights the link between the consumption of violent pornography - prevalent on mainstream platforms and social media - and VAWG.
12. In her review, Baroness Bertin highlighted that Ofcom already has powers under the OSA to tackle the harm caused by pornography: *“The OSA already sets a precedent for Ofcom to regulate ‘legal but harmful’ content, as we can see in the child safety duties. Additionally, Category 1 services in the OSA will be required to set up their own systems and processes to ensure content is not on their services that does not align with their Terms of Service, much of which will be legal content. To this end, I do not consider that identifying and regulating this content will be insurmountable for Ofcom or the platforms themselves.”⁷*
13. Given this conclusion from the pornography review, it is clear that Ofcom has the power to more fully address the harm of pornographic content, especially as it relates to VAWG. If the harm of pornography as a driver for VAWG was more prominent within the guidance and duties for online platforms were contained within a standalone section, highlighting the harm of pornography, the guidance would be stronger and Ofcom’s duties under the OSA in respect of pornography would be more fully met. This standalone section must ensure that platforms properly assess and remove content that may be legal but is harmful to the safety and wellbeing of woman and girls.

RECOMMENDATION: To recognise the harm of pornography and VAWG, the guidance should contain a standalone section dealing with pornographic content and setting out duties for online platforms to reduce the harm caused.

TACKLING THE HARM OF SUBCATEGORIES OF PORNOGRAPHY

⁴ A Tranchese and L Sugiura. (2021). “I Don’t Hate All Women, Just Those Stuck-Up Bitches”: How Incels and Mainstream Pornography Speak the Same Extreme Language of Misogyny. *Violence Against Women* Vol. 27(14) 2709-2734.

⁵ Government Equalities Unit [The relationship between pornography use and harmful sexual attitudes and behaviours](#): literature review’, January 2021

⁶ PsyPost [‘Violent pornography viewers show higher rates of sexual aggression, sexism, and psychopathy’](#) September 2024

⁷ Baroness Bertin, Op Cit pg.18

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

14. The guidance fails to address specific subcategories of pornography that significantly increase VAWG; particularly non-fatal strangulation, incest/step porn and what Baroness Bertin in her review calls ‘age-play’ and ‘teen’ pornography.

Non-Fatal Strangulation

15. The prevalence of non-fatal strangulation, or choking, in pornography has a real-world impact on women and girls. Baroness Bertin, in her review, found a correlation between those who watch pornography, in which choking during sex is normalised, and aggression in relationships.⁸ The review cited evidence of children as young as 10-years-old asking teachers how to choke girls during sex. Viewing pornography was a key contributing factor to this behaviour.⁹
16. Despite warnings that there is no safe way to choke someone during sex, the practice is becoming so prevalent in pornographic content that it is often considered a normal and pleasurable part of sex.¹⁰ In 2019, a BBC 5Live poll found that in the UK, 38% of women (54% aged 18-24) had experienced choking during intercourse.¹¹ Women and girls who experience non-fatal strangulation are also at a greater risk of domestic abuse. Baroness Bertin in her review highlights that, if there has been an incident of non-fatal strangulation in a relationship, a victim is seven times more likely to be murdered by their partner.¹² Furthermore, the review also highlights that, according to the charity SafeLives, around 20,000 survivors of domestic abuse each year are subjected to non-fatal strangulation.¹³
17. Given the substantial level of harm, this subcategory of pornography must be given more prominence in the guidance and a duty should be placed on platforms to ensure this type of content is removed.

Incest/Step Pornography

18. Baroness Bertin in her review highlights that “*the most common form of sexually violent pornography online was family sexual activity*” - this is despite the fact such content is a criminal offence under the Sexual Offences Act 2003.¹⁴ Academic research found that “*depictions of practices that meet criminal standards of sexual violence, including rape, incest and so-called ‘revenge porn’, are labelled in ways that not only minimise or remove their criminality but often mock or belittle the possibility of harm*”.¹⁵ Often the content is presented as sexual activity between step-relatives, however, shifting the narrative to a depiction of step-relations does not minimise risk.

⁸ Baroness Bertin “[Creating a Safer World - the Challenge of Regulating Online Pornography](#)”, February 2025

⁹ Baroness Bertin, Op Cit, page. 69

¹⁰ BBC, 13th March 2025, “[‘He strangled me without asking’ - experts say choking during sex now normal for many](#)”

¹¹ BBC 5 Live, Women’s Poll – 21st November 2019 - https://comresglobal.com/wp-content/uploads/2019/11/Final-BBC-5-Live-Tables_211119cdh.pdf

¹² Baroness Bertin, Op Cit, pg. 86

¹³ Baroness Bertin, Op Cit, pg. 86

¹⁴ Baroness Bertin, Op Cit, pg. 92

¹⁵ Vera-Gray, F., et al. (2021). [Sexual violence as a sexual script in mainstream online pornography](#). British Journal of Criminology, Volume 61, Issue 5, September 2021, Pages 1243–1260, pg.1257

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

19. Front-line workers at Barnardos have highlighted the harm from this category of pornography. Barnardos staff observed a case in which a child, who had been sexually abused by an older relative, turned to pornography to understand her abuse. However, the prevalence of “step pornography” online led the child to believe this was normal. It was not until she disclosed her abuse and was helped to discover that this behaviour was not normal, that she fully understood the violence to which she had been subjected.¹⁶ CARE is concerned that pornography that depicts relationships between family members or stepfamily members where the ‘actors’ are adults, pretending to be a family member/child, reinforces the idea that child abuse is acceptable both for adults and children. This type of harm, particularly as it impacts children, should be given more prominence in the guidance.

Age-Play

20. Baroness Bertin’s review highlighted evidence from several stakeholder groups raising concern that adults role-playing in age-play pornography “could contribute to an interest in CSAM content”.¹⁷ Baroness Bertin’s review went on to observe that it “is not always confirmed across sites that performers in ‘teen’ pornography are actually 18+”.¹⁸ Academic research highlights that this type of pornography “promotes a sexual script premised on underage participants or coercive circumstances, with the use of terms such as ‘pigtails’, ‘homework’ and ‘braces’ to suggest younger teenagers”.¹⁹ A Children’s Commission report has found that titles describing sexual violence were commonly attached to descriptors such as ‘schoolgirl’ and ‘girl’²⁰ which are clearly promoting underage content.

21. Evidence suggests individuals experience an escalation of viewing habits. A person may start out by watching legal, age-play pornography, but their viewing habits tend to become more extreme as they get desensitised to what is harmful, but legal, material.²¹ For some people who view age-play material this is a pathway to viewing CSAM, which in turn is a pathway to physically connecting with a child and committing contact offences. In 2022, an anonymous survey determined that 42% of people who watch CSAM seek contact with children and 58% of people who accessed CSAM were afraid they would offend by contacting a child directly in the future.²² Clearly, age-play content is, in and of itself, harmful due to the objectification of young people, however, it can be a pathway to violent behaviour towards children offline. This should be better reflected in the guidance, with clear duties that this content be removed from platforms.

¹⁶ Barnardo’s, December 2022, [The Online Safety Bill: Impact of Pornography on Children](#), section 2, page 6

¹⁷ Baroness Bertin, Op Cit, pg. 88

¹⁸ Baroness Bertin, Op Cit, pg. 89

¹⁹ Vera-Gray, F., et al. (2021). [Sexual violence as a sexual script in mainstream online pornography](#), British Journal of Criminology, Volume 61, Issue 5, September 2021, Pages 1243–1260, pg. 1255

²⁰ Children’s Commissioner, January 2023, [‘A lot of it is actually just abuse’ Young People and Pornography](#), pg. 13

²¹ Zimbardo P, [‘Is Porn Good for Us or Bad for Us?’](#) Psychology Today March 2016

²² The Guardian [Viewers of online abuse at high risk of contacting children directly](#) March 2022

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

RECOMMENDATION: The guidance should unequivocally recognise that pornography depicting non-fatal strangulation, incest/step-incest and age-play/teen pornography is a key contributing factor to VAWG and set out duties that platforms must adhere to, to minimise risk.

TACKLING THE HARM OF ARTIFICIAL INTELLIGENCE (AI) AS IT RELATES TO PORNOGRAPHY

22. The draft guidance robustly acknowledges several harms resulting from deep-fake and intimate image abuse (IIA) including deep-fake intimate image abuse²³ and collector culture²⁴ as well as promoting misogyny and coercive control. Given the extreme harm being caused to women and girls resulting from AI and pornography, we are concerned that the actions proposed within the draft guidance do not go far enough. Clear duties need to be set out for platforms that allow AI, to prevent pornographic content from being created to cause harm.

23. The guidance, as part of a wider pornography section, should highlight and outline how AI can be better utilised to help platforms tag content to exclude illegal and harmful material, including deepfakes and intimate image abuse material. This issue was raised by Baroness Bertin in her review. Several of her recommendations (e.g. intimate image abuse, consent issues, stolen material and CSAM) call for the introduction of hash-tagging to ensure platforms remove material swiftly and effectively. Her review calls for a standardisation of this type of technology across platforms to ensure consistency.²⁵ This guidance provides an opportunity to send a strong message to industry that consistent and clear systems for removal of harmful material should be implemented as quickly as possible.

RECOMMENDATION: The harm of AI should be covered in a standalone pornography section of the guidance, alongside exploring ways AI can help curb harm through content tagging.

END-TO-END ENCRYPTION

24. The draft guidance does not directly address end-to-end encryption services which are a major enabler of online violence against women and girls. End-to-end encryption is being used, particularly on social media messaging apps, identified as the primary platform for distributing child sexual abuse material (CSAM)²⁶, to groom children. In 2023, the NSPCC reported that a quarter of grooming crimes since 2018 were against primary school-aged children and 73% of crimes involved Snapchat or Meta.²⁷ The National Police Chief's Council has highlighted that *"the widespread adoption of privacy enhancing technologies such as end-to-end encryption can pose additional challenges for*

²³ Ofcom, Op Cit, pg. 16, para 2.36

²⁴ Ofcom, Op Cit, pg. 17, para 2.38

²⁵ Baroness Bertin Op Cit, pg 33

²⁶ Silicon Republic, [Instagram is connecting large paedophile networks, report claims](#), 8th June 2023

²⁷ NSPCC, [82% rise in online grooming crimes against children in the last 5 years](#), 15th August 2023

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

investigation of online and tech-enabled offending".²⁸ Any end-to-end encryption messaging service, without child protection measures included, will inevitably result in an unsafe environment.

25. Issues surrounding the messaging service WhatsApp highlight the correlation between end-to-end encryption and VAWG, particularly sexual abuse. When discussing the issue, Dan Sexton, Chief Technology Officer at Internet Watch Foundation, stated: *"We should not be seeing this in the news time and time again. It is a solvable problem. There are tried, trusted, and effective methods to detect images and videos of child sexual abuse and prevent them from being shared in the first place. But in WhatsApp, these safeguards are effectively switched off, with no alternative measures in place"*.²⁹ The VAWG guidance should be a first step to enforcing a solution to the issues raised by end-to-end encryption by setting out how platforms can protect, particularly children, from harm.

RECOMMENDATION: Ofcom should take a proactive approach and introduce draft guidance to protect women and girls from the harm that is facilitated through end-to-end encryption.

QUESTION 4: Do you have any feedback on our approach to encouraging providers to follow this draft 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?

26. The draft guidance is couched in terms that make it appear optional for platforms to implement and therefore, not enforceable. For example, paragraph 3.10 states *"ultimately it is up to services to decide which policies will be most appropriate for their service"*.³⁰ If guidance is to be enforceable it needs to be more prescriptive. CARE is concerned that giving wide discretion to platforms may ultimately render the guidance little more than good advice, which may not be taken seriously.
27. Ultimately, guidance will only be as strong as the enforcement regime that Ofcom puts in place to ensure compliance. Ofcom should clearly set out what sanctions will be taken and how they will enforce against platforms that do not comply.

²⁸ National Police Chief's Council, [Violence Against Women and Girls Strategic Threat Risk Assessment 2023](#), May 2023

²⁹ Digit News, [Encryption Targeted Over Spread of Child Sexual Abuse Imagery](#), 16th August 2024

³⁰ Ofcom, Op Cit, pg. 19, para 3.10

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

RECOMMENDATION: The guidance should clearly set out standards which are expected from online platforms and Ofcom should clearly outline their plan to enforce the guidance.

ADDITIONAL COMMENT

28. Given this guidance is about VAWG, we are concerned about the term ‘sex workers’ used in the guidance to refer to prostitution. The guidance assumes that prostitution is a consensual activity whereas in many cases it is not. The Scottish Government is clear that “*Commercial sexual exploitation, including prostitution, is a form of gendered violence*”.³¹ We urge Ofcom to use alternative language in this consultation, making it clear that prostitution is a form of VAWG.

CARE Public Policy Team | 53 Romney Street | London | SW1P 3RF | t: 020 7233 0455 |

Email: tim.cairns@care.org.uk

³¹ [Prostitution - Violence against women and girls \(VAWG\) - gov.scot](#)