



Consultation response form

Your response

Question	Your response
<p>Question 1: Do you have any comments on our proposed approach to 'content and activity' which 'disproportionately affects women and girls'?</p>	<p>Confidential? – N</p> <p>We welcome the development of this dedicated Guidance for women and girls' safety online, as mandated by the Online Safety Act 2023, which rightly recognises that <i>"women and girls experience unique and serious risks online"</i> (Guidance 1.3). The commitment to addressing gender-based harms is both necessary and urgent. However, we are concerned that several key and increasingly prevalent forms of content and activity are absent. Notably violent and incest-themed pornography, online commercial sexual exploitation (prostitution), sexual exploitation, and nudification apps, remain under addressed within the Guidance in its current form.</p> <p>Commendably, the Guidance rightly describes <i>"online misogyny"</i> as content that <i>"engages in, normalises or encourages misogynistic attitudes and ideas"</i> (Guidance 2.9). This is acknowledged through the reference to the impact of pornography on attitudes towards consent, noting that <i>"pornography also affects attitudes towards consent, as it is implied (rather than discussed) in pornographic content"</i> (Guidance 2.17). It also highlights evidence from young people who have expressed serious concerns about how pornography distorts perceptions of pleasure, harm, and sexual relationships (Guidance 2.17). This distortion is not a theoretical concern; it has well evidenced, real-world consequences for the prevalence of coercive, degrading, and abusive behaviours against women and girls. Numerous studies, including those referenced in the Guidance, have demonstrated strong correlations between exposure to violent and misogynistic pornography and the normalisation of behaviours such as incest, strangulation, coercive control, and sexual aggression within intimate relationships. For instance, a specialist practitioner working in support services for offenders said: <i>"The majority [of offend-</i></p>

Question	Your response
	<p>ers], not all, get there from adult pornography use ... otherwise they might not have gone there. [The internet] enables this bad behaviour to happen, it almost provokes this behaviour, not only facilitates it, there's a dynamism ... there's all kinds of stuff [online] that you could never have imagined was even there."¹. However, the Guidance fails to sufficiently examine how violent, incest-themed, and AI-generated pornographic content, particularly when disseminated through mainstream pornography sites and platforms like OnlyFans, or via social media algorithms act as a driver for normalising violence against women and girls. These forms of content not only eroticise abuse and familial exploitation but perpetuate a culture of entitlement, degradation, and the dehumanisation of women and girls.</p> <p>Furthermore, while we welcome the emphasis on child protection from pornography being addressed through "safe search" functionalities and restrictions on content appearing in children's recommender systems (Guidance 4.26d and 4.37b), there remains however, a significant gap in equivalent protections for women. Women are also subject to disproportionate harm because of men's consumption of violent, misogynistic, and incest-themed pornographic content. For example, the Revenge Porn Helpline reported a 106% increase in intimate image abuse reports in 2023, with women being disproportionately affected.²The role of pornography platforms, as well as general online services such as social media, platforms such as OnlyFans and search services, in hosting, distributing and algorithmically amplifying such content must be explicitly acknowledged and addressed within this Guidance. While intimate image-based sexual abuse (IBSA) is referenced in the Online Safety Act and addressed in Part 3 and Part 5, guidance regarding age verification and access controls, is notably absent from the VAWG-specific Guidance. As a significant driver of violence against women and girls, and a key mechanism for the amplification of misogyny, pornography, and IBSA must be explicitly regulated and incorporated into the Guidance.</p> <p>While the Guidance recognises the seriousness of image based sexual abuse, noting that "63% of survivors and victims who had experienced harassment online were women"</p>

¹ The Police Foundation, 2022, Turning the tide against online child sexual abuse: https://www.police-foundation.org.uk/wp-content/uploads/2022/07/turning_the_tide_FINAL-.pd

² Revenge Porn Helpline (2024) *Reports to the Revenge Porn Helpline increased by 106% in 2023*. SWGfL. Available at: <https://revengepornhelpline.org.uk/news/reports-to-the-revenge-porn-helpline-increased-by-106-in-2023/>

Question	Your response
	<p>(Guidance 2.24), it does not account for newer and technology driven forms of this abuse. As technology continues to evolve, it is important that the Guidance has measures in place to address this, notably, the proliferation of nudification apps and deepfake sexual imagery tools. These technologies allow for the creation of realistic, non-consensual sexualised images from innocent photos, which are then shared, circulated, or even monetised on platforms like OnlyFans without the victim's knowledge. This represents a significant and escalating form of abuse with devastating psychological, reputational and safety consequences for women and girls. As such, we recommend that specific provisions be made within the foundational expectations for providers to prevent, detect, and swiftly remove content generated by such tools, alongside firm requirements for proactive moderation and reporting mechanisms.</p> <p>Of particular concern is the increasing trend of sexual exploitation of women and girls through the use of nudification apps and deepfake technology, and the growing demand of non-consensual sexual content on platforms such as OnlyFans. In many cases, perpetrators use stolen images or AI tools to fabricate sexualised content, which is then uploaded and monetised, often anonymously. These abuses are not limited to private or anonymous settings: they occur on major commercial platforms whose business models often prioritise monetisation and engagement over safety and consent. Yet, the Guidance makes no explicit reference to this form of exploitation, nor does it provide clear expectations for platforms in preventing, detecting, or removing non-consensual sexual content. While the sharing of deepfake pornography and intimate images is covered by the Online Safety Act, platforms should be reminded of their legal duties under the OSA to take proactive steps to prevent this type of illegal material from appearing on their services.</p> <p>Additionally, the Guidance does commendably acknowledge that women exploited in online commercial exploitation and "adult content creators" often experience unique forms of intimate image abuse (Guidance 2.39), including blackmail, deepfakes, and recording without consent. However, it stops short of addressing the systemic failings of platforms that facilitate this abuse, including the ease with which non-consensual content can be created, uploaded, and monetised. It also fails to recognise the continuum of harm that includes women who are misrepresented as selling sex through unauthorised uploads to pornography sites, pimping websites and OnlyFans, an issue</p>

Question	Your response
	<p>increasingly reported to support services such as the Revenge Porn Helpline.</p> <p>Given the evidence presented throughout the Guidance, as well as consistent findings from frontline services, survivor testimonies and academic research, we strongly recommend that the proposed approach be expanded to explicitly name and address the following areas:</p> <ul style="list-style-type: none"> • We recommend Ofcom expand its approach to explicitly include violent, incest-themed, misogynistic, and AI-generated pornographic content; nudification apps; non-consensual intimate image abuse; online commercial sexual exploitation; and the algorithmic amplification of such harmful material, and recognise their role in fostering VAWG both online and offline. • The hosting, distribution, and algorithmic amplification of violent, degrading, and incest-themed pornographic content, which has a documented link to real-world sexual violence. • The exploitation of women through the non-consensual creation and monetisation of content on platforms such as OnlyFans, particularly when facilitated by AI tools such as nudification apps and deepfakes. • The specific harms caused by nudification technologies, which allow for the creation of realistic, sexualised images without consent, and serve as a gateway to further abuse. • The need for regulatory focus not only on protecting children from online sexual harms but also adult women and girls, who face disproportionate harm in digital spaces.
<p>Question 2: Do you have any comments on the nine proposed actions? Please provide evidence to support your answer.</p>	<p>Confidential? – N</p> <p>Whilst we are supportive of the nine proposed actions in principle, we believe they require significant strengthening to meaningfully tackle the harms posed by violent pornography such as incest-themed content, nudification apps, image-based sexual abuse tools, and the exploitation of women and girls notably through commercial sex websites such as OnlyFans. These forms of content and activity are among the fastest-growing drivers of online violence against women and girls (VAWG), and yet they are not directly addressed within the current set of actions. For instance, a study found that 88.2% of top-rated porn scenes</p>

Question	Your response
	<p>contain physical aggression, with 94% of aggressive acts committed against women.³</p> <p>Action 1 (User empowerment tools) should be extended beyond child protection to offer users greater control over exposure to harmful pornography, including violent, incest-themed pornography and nudification content. The current expectation to protect “<i>children from pornographic content</i>” (Guidance 1.1) must be matched by protections for adult users facing gender-based harms. Filtering and blocking tools should be made available not only for children and young people but for all users, recognising the cumulative harm this content causes to women and girls in adult online spaces. A UK government poll found that 19% of adults who view pornography reported that the content they watch has become more extreme over time.⁴ Social media giants like Google, Facebook, Instagram, and X are increasingly central to daily life, yet their existing systems for dealing with harmful content, designed for an offline world, are now outdated and insufficient in the face of modern challenges.⁵ They rely on the individuals who have experienced the abuse to make reports and complaints and, instead of being responsive to abuse or enforcing meaningful sanctions, they offer suggestions such as taking breaks from being online.⁶ To be effective, user empowerment tools must be inclusive of all age groups and responsive to the gendered harms associated with online pornography.</p> <p>Action 2 (Risk assessments) should require providers to conduct specific, detailed assessments on how their platforms facilitate or amplify pornography-related harms, including incest porn, deepfake sexual abuse, and nudification apps. These assessments should evaluate the role of algorithmic recommender systems in circulating such content and should reference evidence from VAWG and public health experts. For example, researchers observed a four-fold increase in the amount of misogynistic content promoted to users by TikTok over just five days, illustrating the</p>

³ Bridges, A.J., Wosnitzer, R., Scharrer, E., Sun, C. and Liberman, R., 2010. *Aggression and sexual behaviour in best-selling pornography videos: A content analysis update*. Violence Against Women, 16(10), pp.1065–1085

⁴ Department for Science, Innovation and Technology, 2023. *UK government polling: Attitudes to online pornography and platform responsibility*. [online] London: UK Government. Available at: <https://www.standard.co.uk/news/tech/government-polling-conservative-b1214968.html>

⁵ Dawes, M. (2021) In news we trust: Keeping faith in the future of media. Keynote speech, Oxford Media Convention, 19 July. London: Ofcom

⁶ End Violence Against Women Coalition, Carnegie UK, Glitch and McGlynn, C. (2021) VAWG principles for the Online Safety Bill. Available at: <https://www.endviolenceagainstwomen.org.uk/wp-content/uploads/Online-Safety-BillFull-Brief-final.pdf>

Question	Your response
	<p>role of algorithmic amplification.⁷The EVAW Coalition’s recent research highlights the correlation between exposure to misogynistic pornographic material and increased incidents of domestic abuse and sexual violence, a link which providers must be required to consider. Platforms must be held accountable for identifying and mitigating the specific risks their technologies pose to women and girls through robust, expert-informed risk assessments.</p> <p>Action 3 (Terms of service clarity) should explicitly prohibit the hosting, promotion and monetisation of pornography, incest-themed pornographic content and nudification apps. It should also mandate clear, accessible reporting mechanisms for users to flag this content, alongside firm and transparent enforcement policies. Despite the availability of reporting tools, one study showed that while 67% of users reported encountering harmful content, only 26% saw that content removed after flagging, indicating enforcement gaps.⁸ Clear prohibitions and effective enforcement of terms of service are essential to ending the monetisation and spread of gender-based abuse online.</p> <p>Action 4 (Safety by design) rightly references controls over “recommender systems” for children (Guidance 4.37b) but must go further to address algorithmic risks to women and girls. Platforms should be required to conduct regular audits of recommender systems and content moderation processes to prevent the amplification of misogynistic, violent and incest-themed content. As noted, 88.2% of top-rated porn scenes contain aggression, with women being the target in 94% of instances.⁹ Embedding safety for women and girls into platform design and algorithm audits is critical to reducing the widespread online circulation of violent, misogynistic content.</p> <p>Actions 5–9 should be enhanced by:</p> <ul style="list-style-type: none"> • Mandatory moderation training on identifying incest porn, nudification apps and image-based abuse. • Transparent reporting on the prevalence and removal rates of this content. • Inclusion of survivor-informed content moderation and partnerships with specialist VAWG organisations.

⁷ Hern, A., 2024. *TikTok algorithm quadruples misogynistic content served to new users in five days; research finds*. [online] The Guardian. Available at: <https://www.theguardian.com/media/2024/feb/06/social-media-algorithms-amplifying-misogynistic-content>

⁸ Mozur, P., Kessel, J.M. and McCann, A., 2024. *Why moderation fails: What happens when harmful content is reported online*. arXiv preprint arXiv:2401.01796. Available at: <https://arxiv.org/abs/2401.01796>

⁹ Bridges, A.J., Wosnitzer, R., Scharrer, E., Sun, C. and Liberman, R., 2010. *Aggression and sexual behaviour in best-selling pornography videos: A content analysis update*. Violence Against Women, 16(10), pp.1065–1085.

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	<p>Without these revisions, the proposed actions risk missing some of the most harmful forms of online violence against women and girls.</p>
<p>Question 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.</p>	<p>Confidential? – N</p> <p>While the good practice steps and case studies presented are helpful in providing examples of proactive safety measures, they currently lack focus on some of the most serious emerging risks to women and girls in digital spaces. The Guidance itself acknowledges that “<i>pornography distorts understanding of pleasure and harm</i>” (Guidance 2.17) and shapes attitudes towards consent yet does not highlight platform practices for preventing violent pornography such as the exposure and promotion of incest pornography. There is a notable omission of any good practice measures specifically targeting violent and misogynistic pornography, despite clear evidence of its widespread presence and demonstrable harms.</p> <p>A UK Government report (2020) identified a strong association between pornography consumption and harmful sexual attitudes and behaviours towards women.¹⁰ It outlined four specific links: viewing women and girls as sex objects, influencing men’s sexual expectations of women and girls, normalising sexual aggression, and increasing perpetration of sexual aggression. Most respondents agreed that a rise in violent pornography had contributed both to an increase in coercive demands for violent sex acts and to instances of sexual assault. Furthermore, the report found a statistically significant link between pornography use and attitudes supportive of violence against women, with violent pornography demonstrating the strongest association.¹¹ Research by Vera-Gray et al. (2021)¹² also highlighted that incest-themed pornography is not only prevalent but increasingly normalised by online platforms. Exposure to such material has been shown to influence “sexual scripts” and frequent consumption is associated with increased likelihood of engaging in risky sexual practices.¹³ Despite these well-</p>

¹⁰ UK Government, 2020, The relationship between pornography use and harmful sexual attitudes and behaviours: <https://www.gov.uk/government/publications/the-relationship-between-pornography-use-and-harmful-sexual-behaviours/the-relationship-between-pornography-use-and-harmful-sexual-behaviours>

¹¹ Ibid.

¹² Vera-Gray, F., McGlynn, C., MacDonald, S., & Rogers, R. (2021) *Pornography, sexualisation and objectification: Understanding the connections*. London: End Violence Against Women Coalition. Available at: <https://www.endviolenceagainstwomen.org.uk/wp-content/uploads/2021/06/Porn-Report-2021.pdf>

¹³ Durham University (2025) *Why incest porn is more common – and harmful – than you think*. Available at: https://www.durham.ac.uk/research/current/thought-leadership/2025/02/why-incest-porn-is-more-common-and-harmful-than-you-think/?utm_source=chatgpt.com

Question	Your response
	<p>documented risks, the Guidance lacks comparable safeguards, even though it includes recommender system controls under child safety (Guidance 4.37b). This oversight is, especially, concerning given the capacity of algorithmic systems to amplify misogynistic and abusive content, which contributes to the sexual objectification of women and girls and plays a role in shaping harmful sexual attitudes.</p> <p>In addition, there is insufficient attention paid to the role of nudification apps in contributing to violence against women and girls. While the Guidance briefly addresses deepfake technologies, it omits mention of nudification tools—apps that enable the non-consensual creation of sexualised images at scale. The risks posed by this technology are compounded by its accessibility to minors. In several recent cases in the United States, teenagers used nudification apps to create non-consensual images of classmates after encountering advertisements on platforms such as TikTok. According to Graphika, in September 2023 alone, 24 million users visited online "undressing" sites. Since early 2023, referral link spam promoting these services has increased by over 2,000% on platforms such as X (formerly Twitter) and Reddit¹⁴. These services are actively promoted via social media, and the platforms themselves are enabling their spread. In 2023, online security firm Home Security Heroes identified 95,820 deepfake pornographic videos online—a 550% increase since 2019. Notably, 99% of victims featured in deepfake pornography are women, underlining the gendered nature of this abuse.¹⁵ In light of this evidence, good practice measures should include:</p> <ul style="list-style-type: none"> • The removal of nudification apps from app stores. • A ban on advertisements promoting these technologies. • The restriction of payment processing services to developers of such abusive software. <p>In summary, while the good practice steps are a positive foundation, their limited scope risks neglecting the very forms of online violence most strongly associated with domestic and sexual abuse against women and girls. In particular, the absence of references to violent and misogynistic pornography such as incest-themed pornography, nudification technologies, and algorithmic amplification of abuse</p>

¹⁴ Graphika, 2023, A Revealing Picture, AI-Generated 'Undressing' Images Move from Niche Pornography Discussion Forums to a Scaled and Monetized Online Business: <https://rb.gy/aw94xi>

¹⁵ Home Security Heroes, 2023 State of Deepfakes: Realities, Threats, and Impact: <https://www.homesecurityheroes.com/state-of-deepfakes/#key-findings>

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	<p>significantly limits the relevance and effectiveness of the Guidance. Therefore, we recommend that Ofcom:</p> <ul style="list-style-type: none"> • Include good practice examples of platforms removing violent pornography such as incest-themed pornography. • Highlight cases of app stores restricting nudification and deepfake tools. • Require algorithmic audits and public reporting on the amplification of gender-based abuse, drawing on learning from Case Study 11 and extending its application beyond child protection.
<p>Question 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?</p>	<p>Confidential? – N</p> <p>N/A</p>
<p>Question 5: 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>Confidential? – N</p> <p>N/A</p>
<p>Question 6: 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>Confidential? – N</p> <p>N/A</p>

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