



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>Children First is Scotland's national children's charity. We stand up for every child because all children should have a safe childhood. We protect children from harm and support them to recover from trauma and abuse through our national and local services. We help children, their families and the people that care for them by offering emotional, practical, and financial support. We give children hope and a safer, brighter future.</p> <p>This guidance is a welcome, important and necessary step forward in tackling gender-based violence and recognising the impact of these harms on women and girls in particular.</p> <p>Online harm against women and girls isn't a new problem—it's an extension of the abuse and discrimination they already face in their lives. The internet is often used to make these harms worse, by extending and exacerbating existing harmful behaviours like grooming or bullying, or to create a new space to undertake criminal conduct like domestic abuse and sexual assault. Social media and other online platforms are being used to spread and intensify the same gender-based abuse that many women and girls already experience offline. Online spaces can also hide behaviours and attitudes that would otherwise be called out and accounted for.</p> <p>We know that misogynistic behaviour and violence against women and girls are pervasive in the physical world, and the online world is no different. That's why online services need to design their platforms with misogyny in mind from the start and not treat it as something to fix later. This should be made clear in the guidance.</p>

Question	Your response
	<p>Different impacts for women and girls</p> <p>The guidance should also explain that while the root causes of these harms, like sexism and inequality, may be the same, the effects on women and girls can be very different. Girls face extra risks because they are children. They are often targeted and pressured at a time in their lives when they are still growing, learning about boundaries, and relying on adults to protect them.</p> <p>Online harm is one of the greatest threats to children’s wellbeing, and their right to have a childhood that is safe and free from mental or physical harm, including sexual harm. We know that online harm is having a profound impact on the very existence of childhood, as children are exposed to violent and inappropriate material from an incredibly young age. The pressure to share and engage with sexualised content can be intense, and have serious effects on girls’ safety, their development and their wellbeing.</p> <p>Consultation with children and young people</p> <p>To respond to this consultation, Children First worked with a group of young people called the ‘Changemakers’. The group was established in February 2022 and after helping develop Children First’s Bairns Hoose, which supports children and families through care, protection and justice journeys, the group has evolved over time to explore the issues that matter most to them. They have recently focussed on the issue of violence against women and girls and have specifically considered Ofcom’s work on improving online safety for women and girls.</p> <p>Their feedback has been incorporated throughout this response and has offered invaluable insights into the challenges girls face online as well as practical, concrete steps that could be taken to make things better.</p> <p>Children First would strongly suggest that any guidance needs to include a commitment to more research and continuous engagement with children and young people to better understand the overwhelming scale of harm children face online, and what can be done about it.</p> <p>Changemakers highlighted that:</p>

Question	Your response
	<ul style="list-style-type: none"> • “It feels like no one takes it seriously [sexual assault] and that minor things get brushed under the carpet and no one takes action, but this is what means bigger, worse things will happen later.” • Heavily sexualised language and behaviour are normalised online, which appears to be accepted on forums without any challenge. This can then translate into lives offline, leading to sexualised language and behaviours becoming much more normal at a very young age. Receiving explicit images from both peers and strangers is now ‘normal’. • TikTok is one of the most powerful forums, and continues to validate these degrading views of women by continuing to support and pay these influencers and giving them a platform to continue. The young people spoke about understanding that there is no genuine care or concern or safeguarding of young people as these platforms are driven by money. <p>Recognising ‘subtle’ harms</p> <p>We also know that young girls are targeted with more subtle forms of harm, like content that promotes harmful ideas about their health, diets and wellbeing. These can influence their habits and actions and perceptions of body image, and often come with commercial advertising, or recommendations for health and wellbeing that are not always obviously harmful. These forms of harm need to be recognised, particularly in light of recent allegations about social media companies targeting young girls with beauty adverts after deleting pictures of themselves.</p> <p>Misogyny and abuse can be promoted and romanticised as entertainment, particularly through trends like BookTok. These have a strong influence over children and young people’s developing sense of self and their understanding of relationships.</p> <p>The Changemakers also spoke about seeing toxic masculinity continuously escalating as people online appear to lack empathy and think it’s funny to regularly insult and degrade women. They reflected on comments regularly</p>

Question	Your response
	<p>made minimising or ‘gaslighting’ any females experiences.</p> <p>Understanding of domestic abuse</p> <p>It’s important to be clear about what coercive control is, in line with Scotland’s Domestic Abuse (Scotland) Act 2018, which shifted the understanding of domestic abuse from individual incidents to a range of ongoing actions that can culminate in a much greater harm than if any individual action was recorded alone. Children First strongly supported the developments in the 2018 legislation and the expanded definition of domestic abuse and continue to call for this to be the starting point for any further legal or policy reference to domestic abuse.</p> <p>While the 2018 Act is a strong starting place to better reflect the reality of domestic abuse, the new legal definition alone hasn’t moved culture and practice as much as we had hoped. This shows the scale of challenge around properly recognising domestic abuse in all its forms. We know that prejudices and societal views that minimise women and girls’ experiences run deep, and there needs to be a strong, consistent and determined effort by Ofcom to deal with this through this guidance and its enforcement.</p> <p>The 2018 legislation also did not go far enough to acknowledge the impact of domestic abuse on children in their own right. We note that this draft guidance also appears to use a limited definition of domestic abuse by describing it as something that takes place within an ‘intimate relationship’. Research shows that children are also affected by domestic abuse, even when they are not directly targeted by the perpetrator, because they are so closely involved and dependent upon those who are in the abusive relationship.</p> <p>Recent work by the Scottish Law Commission, exploring options in Scotland to amend civil law on domestic abuse, helpfully sets out much of this research in detail, and should be considered by Ofcom to inform</p>

Question	Your response
	<p>the way that domestic abuse is defined in this guidance.¹</p> <p>Specific concerns about ‘Incel’ cultures</p> <p>There has been a succession of incidents in recent years where particularly toxic misogynistic attitudes have led to violent actions. In Baroness Helena Kennedy’s report ‘Misogyny – A Human Rights Issue’, it’s noted that ‘Incel culture’ is a particular issue where misogynistic online cultures turn into violent physical outbursts.² This does not seem to be fully discussed or addressed in the guidance document as drafted and would be improved by further explicit recommendations around how to recognise and counter these cultures.</p>
<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>The Changemakers group have offered clear and practical steps that could be taken by online providers that add to the nine proposed actions outlined in the draft guidance.</p> <p>In particular, the Changemakers focussed on preventative steps that online sites could take. While many of these steps would help protect all children, we know that they are particularly important to help protect girls online, because of the way that they are targeted and attacked.</p> <p>Abusability testing</p> <ul style="list-style-type: none"> • Children and young people tell us consistently that young people are gaining access to spaces that should be restricted. Young people told us “It’s easy to pretend you are someone you are not as there is no security”, and that “Too many young children are on apps like Snapchat... it says no one younger than 12 but this is easy to get around as there is no security”

¹ [Discussion Paper on Civil Remedies for Domestic Abuse \(DP No. 178\)](#)

² [Misogyny - A Human Rights Issue](#)

Question	Your response
	<ul style="list-style-type: none"> • They said there should be stronger identity checks, and when avatars are available, they should not be the sole identifier as they can easily be used to mislead people online. There should also be more warnings around identifiers like avatars, that remind users to think about whether they are sure about the identity of the person. <p>Setting safer defaults</p> <ul style="list-style-type: none"> • There should be stronger default privacy settings that prioritise user safety. For example, Snapmap location and camera access should be off by default. • There should be more restrictions around adult to child interactions by default, especially adult males contacting young users. When children have accounts they should not be visible to other users by default. • There are some features that are obviously open to exploitation. For example, the Changemakers shared that “disappearing pictures across all devices just benefit weirdos”. These should be disabled by default or at least set up with much more control over them. • Discoverability features like ‘Suggested Add’ on Snapchat expose users to strangers and are dangerous for young people. These features suggest people you may know and have mutual friends with and encourages you to bring them into your online space, without safeguards or warnings about the consequences of adding someone to your network. • Features like streaks and snap score also encourage users to accept more friends and should be reconsidered or redesigned so that they do not encourage users to undertake more risky behaviours. <p>Reducing circulation of harmful content</p> <ul style="list-style-type: none"> • Platforms like video game sites are seen to be particularly aggressive, and all of the Change-maker group had experienced regular abuse on these platforms. These included threats of

Question	Your response
	<p>doxing, or sharing their information with malicious intent, and threats of violent and sexual assault.</p> <ul style="list-style-type: none"> • ‘Wizz’ was seen to be particularly challenging for young girls, because even though there were some security measures to verify age, there were lots of ways that this could be easily avoided like using an image of someone else or using filters to edit the picture. • On ‘Wizz’, girls have to ‘put up with’ lots of sexually explicit messages, and people sending pick up lines or harassing girls with unwelcome conversations. The Changemakers described the app as being ‘like Tinder for children’. They had often reported people which did put a block on them, but the user who is blocked can still continue to harass other users, which seems inefficient and concerning when there are clearly persistent problems with certain users. • People often find ways to work around filters to avoid being reported, for example by replacing certain letters while it remains obvious what is being said, like ‘r@pe’. We know that users who are intent on sharing or accessing harmful content will find ways around standard filters, so online providers need to widen their net to catch these comments. <p>Better user control</p> <ul style="list-style-type: none"> • The Changemakers also told us that even where safer defaults are an option they are not always clear or understandable, for example where terms and conditions are really small and the ‘accept’ button is huge. These seem to deliberately encourage users to agree to settings that can increase their vulnerability online, making them less safe and informed. <p>Reporting harm</p> <p>Children First have worked for years to support children and their families through care, protection and justice systems. Through this work, we have often seen abusers encourage a sense of helplessness in victims of harm, and explicitly tell girls that nobody will believe them if they share what has happened. Poor online reporting</p>

Question	Your response
	<p>processes give abusers more power to use this tactic to force victims to stay quiet.</p> <p>The overwhelming majority of online reporting processes are poor. Most platforms are distant and difficult to contact. This creates a sense that nothing can be done, even when children share their experiences with peers and adults around them. Shame, stigma and isolation are powerful tools for those looking to harm and abuse women and girls, and poor reporting processes embolden abusers in what they are doing. If this is not addressed, we are of the view that poor reporting processes make online providers complicit in the harms that are carried out on their platforms, and this should be taken seriously by Ofcom when their monitoring of compliance.</p> <p>When women and girls make a report or complaint, it's important that they receive a response that shows they are being taken seriously and that gender-based harms are not tolerated. This needs to happen to comply with children's right to be listen to and taken seriously, but also so as to help combat victim blaming. Baroness Kennedy's report explained that "Girls are warned from childhood that they must avoid putting themselves in harm's way, that it is THEY who must learn behaviours that might afford them protection from predatory or violent men. They internalise the message that it will be their fault if something happens to them."</p> <p>This means when women and girls report harms, they are often already vulnerable to feeling or believing that it does not matter, or that they are to blame for the harm they have experienced. This needs to be understood by online providers, so that they can respond to reports in a way that is supportive and doesn't lead women and girls to blame themselves or minimise the harm they have experienced.</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?</p>	<p>Confidential? – N</p> <p>The need to be clear and understandable</p> <p>This guidance will may need to be technical to be used by online providers, but it should also be understandable for parents and carers who are trying to understand what companies should be doing. There are a number of</p>

Question	Your response
<p>Please provide evidence to support your comment.</p>	<p>phrases and concepts that could be better explained, such as ‘red teaming’, which is not explained anywhere in the document.</p>
<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? – Y / N</p> <p>Connections to human rights and children’s rights</p> <p>Threats and harassment that harm women and girls can be violations of human rights, set out variously in the Convention on the Elimination of All Forms of Discrimination Against Women of 1979, the Council of Europe Convention on the Elimination of Violence against Women and Girls (the Istanbul Convention), the United Nations Convention on the Rights of the Child (the UNCRC) and the Convention on the Protection of Children against Sexual Exploitation and Abuse (the Lanzarote Convention).</p> <p>In particular, we would highlight Article 19 of the UNCRC, which says that Governments must do all they can to ensure that children are protected from all forms of violence. General Comment No. 25 on children’s rights in a digital environment should also be used as a starting point for Ofcom and the UK and Scottish Governments when considering the approach to encouraging users to follow this guidance.</p> <p>These legal agreements place a clear responsibility on government to ensure that online providers take their responsibility to protect women and girls seriously, and make sure that the government uses every measure available to it to make sure companies are accountable and take action in line with this guidance. We would suggest regular, transparent reporting is the best starting place for this.</p> <p>Continuous public reporting on how companies are complying with this guidance would build a sense of accountability and responsibility, and also to allow consumers to use this information to influence their habits and allow for further debates around further actions that may need to be taken to address these challenges. It’s important that this guidance is not the end of the public conversation about what companies are doing to tackle harm to women and girls online.</p>

Question	Your response
<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? – Y / N</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? – Y / N</p> <p>No comment.</p>

Please complete this form in full and return to OS-Section54@ofcom.org.uk.