

Ofcom Online Safety Team
Ofcom
Riverside House
2A Southwark Bridge Road
London SE1 9HA

By email: OS-Section54@ofcom.org.uk.



Re: Consultation on OFCOMs draft guidance on a safer online for women and girls

Te Mana Whakaatu – Classification Office (the Office) welcomes the opportunity to provide feedback to Ofcom on the [draft guidance on a safer life online for women and girls](#). Thank you for inviting us to participate in this process. We appreciate the good relationship and open lines of communication between our agencies.

The Office is a content regulator, but not a service regulator. We have focused our feedback on the areas where we have expertise or evidence to offer. This reflects our wealth of experience in classifying content, researching harms, educating the public and providing resources to empower New Zealanders to make informed choices about what they watch, and to protect themselves and their children and young people. We've decided to contribute to this particular consultation opportunity because of the relevant research we published in May 2024 on [online misogyny and violent extremism](#).

This response is not confidential, but the views expressed here are those of the Office only.

About us

The Classification Office is an independent Crown entity in Aotearoa New Zealand. Our roles and functions are set out in the [Films, Videos, and Publications Classification Act 1993](#) (the Classification Act). Broadly, we:

- Classify physical content (such as films released in cinemas or on DVD) and material submitted by Crown agencies and the courts. The Chief Censor has statutory powers to restrict and ban some harmful content.
- Provide information, education, and resources to empower New Zealanders to make informed choices about what they, and their children and young people, watch.
- Support streaming services to rate their content for New Zealand viewers.
- Produce research and practical resources to help New Zealanders understand the classification system.
- Provide a complaints and enquiries service to the public.

- Maintain expertise in countering violent extremism to support the wider government response.

Question 1: Do you have any comments on our proposed approach to 'content and activity' which 'disproportionately affects women¹ and girls'?

Definitions

Our research into online misogyny matches the understanding of gender-based harm expressed in your discussion document, particularly the idea that online and offline harms co-occur and overlap and that gender-based harms are intersectional².

There is a link between violent extremism and gender-based harms

Our research also indicated a connection between misogynistic content and other kinds of extreme content, including racist, terroristic and violent ideologies³. Addressing gender-based harm is likely to be a positive step in the direction of combating other online harm.

Intimate image abuse

We support the inclusion of AI generated content in your definition of intimate image abuse and your acknowledgement of the broad range of harm this content causes. [Our legislation](#) is agnostic with regard to how content is generated so harmful content is classified using the same criteria, regardless of how it was created or whether it depicts real people.

We feel it would be worth clarifying that your approach is medium or creation agnostic to future-proof against any emerging technologies or novel methods of intimate image abuse.

Question 2: Do you have any comments on the nine proposed actions?

Young people are encountering harmful content online by accident

[Content that Crosses the Line](#), our 2025 consultation with young people on what harmful content (including gender-based harm) they are exposed to online found that their

¹ In line with international practice, we use the term 'women and girls' in an inclusive manner. It refers to women and girls in all their diversity, including but not limited to faith, race, ethnicity, sexual orientation, gender identity, and disability. Therefore, the term encompasses women and girls across a spectrum of backgrounds, identities and lived experiences.

<https://www.classificationoffice.govt.nz/resources/research/online-misogyny-and-violent-extremism-index/about-this-project/#the-term-women-and-girls>

² [Online abuse and harassment of women and girls | Classification Office](#)

³ [Misogyny, violence and violent extremist ideologies | Classification Office](#)

exposure to it is often unintentional⁴. Young people want to be able to receive help when dealing with this sort of content without fear or judgement and to feel empowered to handle situations where they encounter this kind of content.

Young people are frustrated by current content moderation systems

Young people we spoke to lack confidence in current content moderation systems. Some expressed a sense of resignation or despondency when talking about harmful content or how to address it⁵.

Young people want measures that are likely to help young people deal with harmful content, whether they are reporting mechanisms or setting safer defaults to give users control over their experiences. Transparency reporting will only help if users feel empowered to report content in the first place.

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?

Algorithms and body image

When we spoke to young people about their experiences of seeing body image content on social media, most described scrolling through feeds in a more or less passive way because of platform design. Some mentioned being more active in terms of influencing or shaping what shows up in their feeds. More often, young people would look at what comes up in their feed and then move on.⁶

While some felt a sense of control over shaping their social media feeds, the young people talked about the negative aspects of algorithms. Some expressed a lot of frustration about the type of content being served up to them. For example, interacting with a post about nutrition could lead to further content about dieting or weight loss, which then leads to further content unless they take active steps to influence what's coming up on their feeds.

⁴ Te Mana Whakaatu, 2025. [Content that Crosses the Line: Conversations with young people about extremely harmful content online](#), p.7

⁵ Ibid, p.34-35

⁶ Te Mana Whakaatu, 2024. [Digital Reflections: The Online Experience and its Influence on Youth Body Image in Aotearoa | Classification Office](#), p.38

Algorithms and extremely harmful content

Young people we spoke to have noticed that algorithmic recommender systems are spreading all sorts of extremely harmful content, not just the misogynistic content highlighted in Case Study 11. They feel that harmful and disturbing content is being pushed on them online because the algorithms are designed for engagement, whether it is positive or negative⁷. Even when they don't like content, if they interact with it, they see more of it.

Question 5: Do you have any comments on our impact assessment, rights assessment, or equality impact assessment?

Freedom of expression

As a content regulator we are required to uphold freedom of expression when making decisions, and to make decisions that are the least restrictive of that right. Social media companies may be more risk-averse when it comes to content moderation. A risk-averse approach has the potential impede people's right to freedom of expression. For example, services may systematically remove content that is discussing gender-based harm rather than perpetuating it.

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?

Yes, we agree that having the guidance in the indigenous language/s of the United Kingdom would have positive effects. In answering this question we acknowledge our unique context in New Zealand where the Crown and Tangata Whenua have a treaty based relationship. In practice, ensuring equity for Māori means service design that is accessible by Māori, and upholds their rights. Having information in te reo Māori and other languages used by communities in New Zealand is common practice. We welcome the opportunity to discuss these concepts further if desired.

⁷ Te Mana Whakaatu, 2025. [Content that Crosses the Line: Conversations with young people about extremely harmful content online](#), p16

Let us know if we can help in any way

We appreciate the opportunity to provide feedback on this consultation, and would welcome any further engagement with Ofcom as this work progresses.

Ngā mihi nui,

A handwritten signature in black ink, appearing to be 'CF', written in a cursive style.

Caroline Flora

Chief Censor—Kairāhui Whakaaturanga Poumatua
Classification Office—Te Mana Whakaatu