



TO: Ofcom

FROM: Common Sense Media

DATE: 23 May 2025

RE: [Consultation](#): A safer life online for women and girls

CONFIDENTIALITY:

Per Ofcom's consultation response form, the whole response below is not confidential. Responses may be attributed to Common Sense Media.

RESPONSE:

Common Sense Media is the leading nonprofit organisation working on behalf of children and teens to make their world healthier, safer, and more equitable. Backed by the research that's the foundation of everything we do, we champion quality media that entertains and inspires, and support legislation that aims to close the digital divide and hold social media platforms accountable. We encourage students and educators to think critically about technology and become responsible digital citizens. And we safeguard children's health and well-being by protecting their data privacy and reducing potential online harms.

We are pleased to submit these comments in response to Ofcom's Consultation: A Safer Life Online for Women and Girls. Common Sense supports Ofcom's efforts to protect the safety of women and girls online while ensuring their freedom of expression, and we offer constructive suggestions to achieve this balance below.

More specifically, our responses to the consultation:

- Highlight proposed legislation and laws recently enacted in the U.S. that aim to address the broad range of threats that women and girls face online.
- Demonstrate how risk assessments could help make the online world safer for women and girls.

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

Firstly, we commend Ofcom for taking tangible steps to encourage accountability among online platforms for their effects on women and girls. Ofcom has commendably tackled a broad range of online threats to women and girls, including both commonplace threats like online misogyny and harassment as well as the severe danger of domestic abuse and image-based sexual abuse. Common Sense has been a staunch advocate for legislation that creates accountability for platforms' roles in the proliferation of sexual abuse material and child sexual abuse material (CSAM) online. See e.g. the TAKE IT DOWN Act signed into law on May 19, 2025¹, AB 1831² and SB 1381,³ signed into law in California in 2024, and Governor Kathy Hochul's 2025 Budget⁴, which includes a provision for AI CSAM. Given Common Sense Media's expertise in research and policy advocacy concerning online harms to children, we would like to affirm Ofcom's broad definition of harms to women and girls and to provide additional evidence substantiating the harm that online harassment and image-based sexual abuse pose to women and girls.

Ofcom's "image-based sexual abuse" category notably includes all forms of intimate image abuse and cyberflashing. Not only is intimate image abuse a serious source of harm for women and girls online, it is also often under-regulated⁵. Common Sense has zealously advocated for legislation in the United States addressing a broad range of intimate image abuse online. Notably, Common Sense helped in drafting and vigorously supported the "TAKE IT DOWN" Act, a federal bill that was signed into law just this month, which would prohibit the nonconsensual sharing of intimate images and require online platforms to remove intimate images within 48 hours if any person depicted objects to its continued publication. Additionally, Common Sense has encouraged state-level legislation such as the California CSAM AI laws and the governor of New York's expansion of the definition of CSAM under criminal law. These bills extend existing prohibitions on the hosting and dissemination of CSAM to include digitally-generated imagery created by AI or other technologies.

Intimate images shared online are a substantial and severe source of harm for women and girls. With the introduction of AI, the problem has grown even worse. According to research

¹47 U.S.C. 223 (h). <https://www.congress.gov/bill/119th-congress/senate-bill/146>).

²Assem. B. 1831, 2023-2024 Leg., Reg. Sess. (Cal. 2024), https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202320240AB1831

³ Senate. B. 1381, 2024-2025 Leg., Reg. Sess. (Cal. 2024), https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=202320240SB1381

⁴ <https://www.governor.ny.gov/programs/fy-2025-executive-budget>

⁵ For example, even CSAM -- the most heavily regulated type of intimate imagery--- is underregulated. Despite the fact that the National Center for Missing and Exploited Children received 4,700 reports of CSAM created by or using AI in 2023, only 38 of 50 states criminalize AI-generated CSAM. Substantially fewer legal protections protect women and girls from sexual abuse material not involving or depicting children and even less to consensual intimate imagery or non-sexual intimate imagery that is wrongfully shared online. See Enough Abuse, State Laws Criminalizing AI-generated or Computer-Edited CSAM (last visited May 22, 2025),

<https://enoughabuse.org/get-vocal/laws-by-state/state-laws-criminalizing-ai-generated-or-computer-edited-child-sexual-abuse-material-csam/>

conducted by the Internet Watch Foundation in 2024, the use of AI to generate CSAM is increasing, and the AI technology is improving, making it easier for bad actors. Their analysis from July of 2024 showed that a total of 3,512 AI CSAM images had been shared on the dark web.⁶ This same report found that there was also an increased amount of AI generated content - including CSAM generated by AI on the clear web.⁷ Furthermore, this report found that the first AI CSAM videos are now in circulation, and these videos are mostly “deepfake” videos.⁸ Intimate image abuse causes deep psychological, emotional, and sometimes physical harm to women and girls. In a representative sample of 2,574 law enforcement officers’ CSAM possession cases, 62% of arrested CSAM possessors had pictures of mostly girls.⁹ With the advent of AI-generated CSAM, the survivors of the initial sexual abuse are revictimized when photos or recordings of the initial sexual abuse are distributed online or used to train AI to make additional content. Even with CSAM produced using AI or computer programs, to accurately recreate child sexual assault, an AI program must first find existing CSAM images.¹⁰ This means that those who generate CSAM using AI are relying on the prior victimization of actual children in the creation of these CSAM images.¹¹ Further, studies show that possession and distribution of CSAM leads to other types of sexual exploitation of minors, for example, when abusers use child pornography to seduce or groom their victims.¹² In this way, the distribution of sexual imagery constitutes both a harm in and of itself and a risk factor for future harms. The sharing of intimate images without consent harms those depicted, even if the images are non-sexual, even if the activity depicted was consensual, and even if all parties initially consented to its publication. Thus, the broad scope of harms covered by Ofcom’s image-based sexual abuse is well-suited to cover the range of threats women and girls face from intimate images online.

Common Sense’s research also supports Ofcom’s focus on the threat that cyberflashing poses to women and girls. Common Sense surveys show that teens are routinely exposed to intimate imagery online without their consent. As many as 58% of teens report unintentionally encountering online pornography, and cisgender girls reported higher rates of accidental-only exposure (34%).¹³ The trend is not only widespread but also frequent and prevalent across a wide range of platforms. Of those teens who reported that they *only* see pornography accidentally, 63% said they saw pornography at least once in the past seven days, and accidental online exposure

⁶ Internet Watch Foundation, *AI CSAM Report Update: What has changed in the AI CSAM landscape?* (2024), https://www.iwf.org.uk/media/nadlcb1z/iwf-ai-csam-report_update-public-jul24v13.pdf.

⁷ *Id.*

⁸ *Id.*

⁹ Janis Wolak et al., *Child-Pornography Possessors Arrested in Internet-Related Crimes: Findings From the National Juvenile Online Victimization Study* (2005), <https://scholars.unh.edu/cgi/viewcontent.cgi?article=1032&context=ccrc>

¹⁰ U.S. Dept. of Homeland Security, *Artificial Intelligence and Combating Online Child Sexual Exploitation and Abuse* (2024), https://www.dhs.gov/sites/default/files/2024-09/24_0920_k2p_genai-bulletin.pdf; CA CSAM AI Bill Fact Sheet (2025),

<https://www.commonensemedia.org/sites/default/files/featured-content/files/ca-csam-ai-berman-bill-one-pager-2024-updated-6.2024.pdf>

¹¹ CA CSAM AI Bill Fact Sheet (2025),

<https://www.commonensemedia.org/sites/default/files/featured-content/files/ca-csam-ai-berman-bill-one-pager-2024-updated-6.2024.pdf>

¹² *Id.*

¹³ Common Sense Media, *Teens and Pornography* (2022),

<https://www.commonensemedia.org/sites/default/files/research/report/2022-teens-and-pornography-final-web.pdf>

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came from a variety of sources, including links to websites that they were sent, online ads, search engine results, and social media.¹⁴

Intimate imagery encountered online plays a role in what teens learn about and relate to sex, including potentially harmful lessons about sex and violence. According to Common Sense research, the majority of teens who viewed pornography online (whether intentionally or unintentionally) said they learned about sexual relationships and sex from the pornography they watched. 48% even said they have learned about “how to talk with partners” from the pornography they have seen. However, the content teens view often includes violent and/or aggressive behavior. For example, the majority of teens indicated that they have seen pornography showing rape, choking, or someone in pain. Equally troubling, two-thirds of teens who have seen any online pornography had never seen pornography that depicted an ask for consent prior to sex.¹⁵

Still, the overwhelming majority of teens say that they have learned what types of sexual behaviors are likely to feel pleasurable to a partner (73%) or not (60%) from pornography they’ve seen.¹⁶ This has possibly distorted their perceptions of the prevalence of harmful sexual behaviors. Among teens who have seen online pornography, 21% agreed that most people like to be hit during sex, that it is safe to put your hands around someone’s neck during sex, and the numbers increase substantially for those who have viewed violent pornography.¹⁷ Further, intimate imagery online often reinforces negative stereotypes about gender, sexual orientation, and race/ethnicity, and seeing stereotypes about their identities in pornography can lead to negative feelings like disgust and self-consciousness for teens¹⁸. Much of the pornography that teens view online (55%) shows stereotypes based on gender, sexual orientation, or race/ethnicity. Teens who are exposed to intimate imagery unintentionally experience guilt and shame at rates higher than those who intentionally seek out intimate imagery.¹⁹

Similarly, Common Sense has conducted extensive research on teens' attitudes and behavior online and can affirm the pervasiveness and danger of online harassment. Online harassment is an important issue for young people, at least in the U.S., where the majority of young people will be faced with body shaming, sexist, transphobic, racist, or homophobic comments online.²⁰ Online harassment has negative emotional impacts (e.g., feeling sad, anxious, or worried)²¹ and can lead to serious mental health concerns like depression.²² Notably, a review of 36 separate studies found a consistent relationship between cyberbullying via social media and

¹⁴ *Id.* at 13-14.

¹⁵ *Id.* at 21.

¹⁶ *Id.* at 22.

¹⁷ *Id.* at 21.

¹⁸ Common Sense Media, *Teens and Pornography* (2022),

<https://www.commonsensemedia.org/sites/default/files/research/report/2022-teens-and-pornography-final-web.pdf>.

¹⁹ *Id.*

²⁰ Common Sense Media, *A Double-Edged Sword: How Diverse Communities of Young People Think About the Multifaceted Relationship Between Social Media and Mental Health* (2024),

https://www.commonsensemedia.org/sites/default/files/research/report/2024-double-edged-sword-hopela-b-report_final-release-for-web-v2.pdf

²¹ The U.S. Surgeon General’s Advisory, *Social Media and Youth Mental Health* (2023),

<https://www.hhs.gov/sites/default/files/sq-youth-mental-health-social-media-advisory.pdf>

²² *Id.*

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depression among children and adolescents.²³ Adolescents seem to attribute this trend at least in part to a lack of accountability among social media companies. Almost 75% of adolescents say social media sites are doing a fair to poor job of addressing online harassment and cyberbullying.²⁴ While online platforms might already offer various user controls, teens and young adults have expressed interest in exercising more control over what they see in their feeds and are even more likely to do so, even taking temporary or permanent breaks from problematic social media accounts, when experiencing depressive symptoms.²⁵ According to Common Sense Surveys, roughly half of social media users aged 14 to 22 struggle to control their use of media.²⁶

Further, adolescent girls are disproportionately impacted by online harassment and abuse. Nearly 6-in-10 adolescent girls say they've been contacted by a stranger on certain social media platforms in ways that make them feel uncomfortable.²⁷ Additionally, girls are much more likely to come across sexist (62% vs. 54%) and body-shaming comments (63% vs. 56%).²⁸ However, despite the fact that girls are more likely to come across negative comments online, platforms also offer an important avenue for identity affirmation and support that shouldn't be cut off. Women and girls are more likely to report coming across all types of identity-affirming comments, including those that support intersectional identities (65% vs. 52%), people from different racial and ethnic backgrounds (65% vs. 58%), and body positivity (74% vs. 64%).²⁹ As Ofcom and online platforms aim to enact Ofcom's guidance and implement measures to reduce harm to women and girls online, it is imperative to leave space for self-expression and support on sensitive topics.

²³ *Id.*

²⁴ *Id.*

²⁵ Common Sense Media, *A Double-Edged Sword: How Diverse Communities of Young People Think About the Multifaceted Relationship Between Social Media and Mental Health* (2024), https://www.commonsensemedia.org/sites/default/files/research/report/2024-double-edged-sword-hopela-b-report_final-release-for-web-v2.pdf

²⁶ *Id.*

²⁷ The U.S. Surgeon General's Advisory, *Social Media and Youth Mental Health* (2023), <https://www.hhs.gov/sites/default/files/sg-youth-mental-health-social-media-advisory.pdf>

²⁸ Common Sense Media, *A Double-Edged Sword: How Diverse Communities of Young People Think About the Multifaceted Relationship Between Social Media and Mental Health* (2024), https://www.commonsensemedia.org/sites/default/files/research/report/2024-double-edged-sword-hopela-b-report_final-release-for-web-v2.pdf

²⁹ *Id.*

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

Common Sense would like to comment on Action 2 concerning risk assessments, as well as Actions 6 and 9 concerning reducing the circulation of harmful content and taking appropriate actions against the posters of harmful content.

Regarding Action 2, Common Sense would like to commend and encourage the use of risk assessments to focus attention on the most actionable harms. Common Sense has utilized risk assessments in proposed legislation in the U.S. For example, the proposed Leading Ethical AI Development for Kids Act in California, AB 1064³⁰ (“LEAD”), applies a comprehensive risk-based approach to legislating primarily based on third-party risk assessments conducted with guidance from a central standards board. We have found risk assessments to be an important feature of online safety regulations, because they allow legislators to balance measures to support safety (in Ofcom’s case, safety for women and girls online) with fundamental rights such as freedom of expression and privacy.

LEAD would require developers to conduct a self-administered initial risk assessment of their products as well as to submit to third-party audits of their AI systems. Risk classification is based in part on the likelihood and severity of the risk, where the risks are adverse impacts to children’s safety, health, privacy, educational outcomes or opportunities, or access to essential services or benefits. However, risk classification under LEAD also allows developers to weigh the anticipated benefits of a product against these anticipated risks.³¹ The one exception to this is a prohibited risk category that narrowly defines a class of products so harmful that they are unsafe for use by children and even this is tempered by a catchall exception that an otherwise prohibited risk product to be classified as high risk if it is deemed necessary to ensure a child’s mental or physical health or safety.³² LEAD would also require developers to complete pre and post deployment impact assessments that address the “*purpose for which the product is intended, technical capabilities, limitations and functionality, specific adverse impacts, internal governance, and the timing for the development and submission to the board of those evaluations and assessments.*”³³

By using self-administered risk assessments, LEAD would be prompting developers to be ethical by design and think about how their products impact children before they make their products available to children. In Ofcom’s case, a gender risk assessment is likely to encourage platforms to pay special attention to how their platforms affect women and girls. A prohibited risk category might be less available given the separate concerns that preventing a specific gender from accessing a platform would pose, in contrast to the sensibility of restricting access for minors. However, prohibiting certain features or policies that are acknowledged as harmful to women and

³⁰ Assem. B. 1064, 2025–2026 Leg., Reg. Sess. (Cal. 2025), https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB1064

³¹ <https://trackbill.com/s3/bills/CA/2025/AB/1064/analyses/assembly-privacy-and-consumer-protection.pdf>

³² Assem. B. 1064, 2025–2026 Leg., Reg. Sess. (Cal. 2025), https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB1064

³³ *Id.*

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girls is more attainable given the complexity of social media and other online platforms as bundles of products rather than individual ones.

Regarding Actions 6 and 9, persuasion, removal, and reduction all present promising pathways to make online platforms safer for women and girls when balanced against all users' rights to free expression and privacy online. Common Sense concurs that the removal of certain content, like nonconsensual intimate imagery (NCII), can be consistent with even the most robust protections for freedom of expression. In the United States, Common Sense supports the "TAKE IT DOWN" Act, a recently passed federal law that requires online platforms to remove NCII within 48 hours of receiving a valid removal request from an identifiable individual (i.e. an individual depicted in the content or an authorized agent acting on behalf of that person).³⁴ Common Sense believes that "TAKE IT DOWN" survives the U.S. Constitution's rigorous First Amendment standard for free speech, given the compelling government purposes of protecting individuals' right to privacy and the law's narrow tailoring to target only intimate images that depict an identified individual. Everyone deserves the right to decide how and with whom to reveal intimate images, whether real or artificial.

³⁴ See Press Release, Common Sense Media, Common Sense Statement on the Signing of the TAKE IT DOWN Act (May 2025), <https://www.common sense media.org/press-releases/statement-on-the-signing-of-the-take-it-down-act>

Conclusion

Common Sense Media emphasizes that meaningful engagement is vital to our mission of safeguarding children in the digital landscape. Additionally, strong global collaboration among regulators, civil society, and the tech industry is crucial for tackling shared challenges and enforcing child safety policies. We commend Ofcom for its global outreach, regulatory advancements, and commitment of resources to navigate these complex issues.

We appreciate the opportunity to participate in the *A Safer Life Online for Women and Girls Consultation*. As a trusted global brand dedicated to children and families, we are eager to contribute our perspectives as Ofcom formulates essential regulatory guidance, standards, and tools aimed at enhancing the well-being of children in the UK.

About Common Sense Media UK

Common Sense is an independent nonprofit organisation dedicated to helping children thrive in a rapidly changing world. The organisation is based in San Francisco with regional offices across the U.S. We launched our first international office in the UK in 2019, a registered charity (also Common Sense Media, 1188840), through which we rate, educate, investigate, and advocate for the safety, privacy, and well-being of children in the UK and globally. Common Sense Media achieves its aim to create a healthier, equitable, and empowering future for children in the following ways:

RATE: Through our U.S.-based parent platform, Common Sense Media, we provide independent ratings and reviews of various forms of media.

EDUCATE: Through Common Sense Education, we share our Digital Citizenship curriculum with millions of teachers across the world to increase media literacy and shape digital citizens, as well as offer tips to families and communities as they navigate media and technology. The curriculum has been adapted for the UK and translated into Welsh.

ADVOCATE: We advocate and raise awareness to drive policy and industry changes that protect the safety, well-being, and privacy of children in the digital world, including the UK, EU, and USA.

INVESTIGATE: Our team conducts independent research to provide parents and caregivers, educators, health organisations, and policymakers with reliable, independent data on young people's use of media and technology and its impact on their physical, emotional, social, and intellectual development.

For more information, visit <https://www.commonsense.org/> and <https://www.commonsensemedia.org.uk>