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## Your response

### Question

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

### Your response

Confidential? – N

While intimate image sharing, whether for self-expression, personal discovery, or the creation and distribution of pornography as work, is often

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positioned as a site of harm, the specific content and activity that disproportionately affects sex workers online is rarely acknowledged in full. Although this community includes a range of gender identities and ages, the act of consensual image sharing, particularly when it constitutes labour, is still largely performed by women. Because this sector sits outside traditional labour protections, violence perpetrated by image and video recipients frequently goes unchecked.

Given the Act's focus on reducing violence against women, it is important to recognise that harmful attitudes toward those who choose to share intimate images and videos are rooted in both misogyny and misandry. Hatred toward women often manifests as sexual degradation and control. Hatred toward men, in this context, can appear as the blanket assumption that all consumers of pornographic content are inherently violent or predatory. When content is shared ethically and with appropriate safeguards in place, it is neither inherently violent nor harmful.

With a particular focus on sex work, image-based sexual abuse is estimated to be up to three times more likely for sex workers than for the general public (West, 2024). The true figure may be even higher due to widespread underreporting and the stigma surrounding this form of labour. The threat of exposure and social exclusion makes sex workers especially vulnerable to psychological trauma, physical harm, and ostracisation.

The images and videos shared online by this community require far stronger protection than currently exists under UK law. Section 2.15 of the Online Safety Act refers to the use of technical measures to prevent image-based abuse. Image Angel provides such a solution, designed to establish guardianship and accountability across platforms.

Our technology embeds invisible, unremovable data into the pixels of image/video at the point of access, when they are viewed, bought, or downloaded. This data identifies the recipient. We have also developed a hashed reporting mechanism that enables platforms to both report and detect those who are flagged in our system as re-distributors of unauthorised content.

Even if the content is screenshotted, photographed with a secondary device, or printed and

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re-photographed, we can extract identifying information from a single leaked image or video frame.

Image Angel offers a discreet, resilient, and ethical solution to protect online content senders, and women and girls more broadly, from image-based abuse. At the same time, we reinforce trust in platforms by providing a meaningful form of accountability should consent be broken.

For activity which **disproportionally affects women and girls**; There must be a balance between the right to consensually sell or share your image, and protection from it being weaponised against you. This is where tools like StopNCII, while valuable, fall short for sex workers and others who wish to re-use or circulate their content. Hashing technology is designed for total blocking of an image, it prevents any reappearance regardless of context. But for many, these files are not just private, they are assets, a means of earning a living. Limiting their consensual use because a perpetrator refuses to behave once again places the burden on the victim, not the abuser.

Some people do not wish use the Stop NCII hashing system as they know it will block their content from being sold or consensually shared should they attempt to upload it themselves. Women and girls must be able to retain control over their content, regardless of a 3rd party threats to use it against them, without losing access to it via a catch all blocking method. Image Angel was developed from an experience that fell between these guardrails and its development was built to support this nuanced reality in which many women live.

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

Confidential? – N

The nine proposed actions are welcomed and will, in particular, offer crucial guidance to platforms. They have for too long exploited the labour of sex workers without offering any protections from misogynistic abuse or image-based sexual violence.

With regard to **Action One**, adult platforms are indeed expected to implement governance and accountability mechanisms that address online gender-based harms. Image Angel provides built-in infrastructure that supports this goal. Our technology protects content in real time through

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our integrated software.

Image Angel helps technology facilitated, or image based sexual abuse charities, police networks and platforms to respond swiftly to breaches. If image-based sexual abuse occurs, our secure, AWS-based cloud system allows for rapid data extraction, enabling fast identification of the source platform and user. This can aid takedown support, particularly from countries outside of DMCA zones, as well as aid in limiting the perpetrators ability to access more content pr platforms. Image Angel gives platforms, charities and the police a tool to act decisively **‘to take down illegal content’**, both in meeting regulatory expectations and in protecting their users, including sex workers and other high-risk groups.

Governance in the digital space must include access to protective infrastructure. Ethical accountability means more than moderating harm after the fact. It requires adopting technologies that deter abuse and enable tracing from the outset, should a leak occur. This can be a critical part of **"Setting policies designed to tackle forms of online gender-based harm."**

Terms of service must evolve. They should not only regulate the behaviour of sex workers, but also address the responsibilities of consumers and platforms themselves. Platforms must make a clear legal commitment to embed preventative tools and reporting systems like Image Angel. Our Digital Guardianship technology functions as an established **"oversight mechanism for Trust and Safety decisions,"** providing traceability, deterrence, and a route to justice when consent is broken.

We are also recognised **"subject matter experts,"** with a leadership team that brings lived experience and academic insight. Our founder and CEO, Madelaine Thomas, is a survivor of image-based sexual abuse and a leading campaigner for platform safety. Members of our team hold doctorates in online sex work and digital governance. This positions Image Angel to offer not only technology, but also consultancy and strategic support to platforms committed to safety and accountability.

In relation to **"Creating a media literacy-by-design policy to promote critical and informed use of its service,"** we recommend that adult platforms require consumers to watch a short,

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accessible training video. This should cover image-based abuse, verbal harassment, ethical consumption, and respectful user behaviour. Image Angel can help platforms design this education module, including information that Digital Guardianship technology is in place and that any breach of consent may result in identification and legal escalation.

These points also relate to **Action 3**, **Action 6** and **Action 9**. User to user content sharing platforms, or platforms that allow private voice, image or video messaging that adopt Image Angel offer immediate transparency on protective mechanisms adopted. Moreover, this drives platforms to take legal responsibility for image-based sexual abuse, as those that ignore preventative technologies are evidently accountable for this harm. As noted, Image Angel offers platforms the ability to **‘Reduce the circulation of online gender-based harms’** across a diverse array of content. Current on-platform solutions visibly mark only a portion of content. These existing protective measures can easily be obstructed or cropped. Image Angel protects entire videos frame by frame, and embeds throughout images allowing identification even when content is only half visible, allowing for a rapid response to distributors of illegal images or videos. In contrast to other alternatives, we also provide unmatched resilience using just one image. Our algorithm resists distortions and attacks including cam-cording, HDCP stripping, collusion, printing and screen-casting. Our extraction service accommodates diverse geometric distortions occurring when images are captured from different angles, positions, and distances, as well as mirroring. The mark withstands colour conversion, sharpening, and other image alterations.

As well as reducing the amount of non-consensual content in circulation through deterrence, this enables platforms to **‘Take appropriate action when online gender-based harms occur.’** Enforcement actions can be taken to hold perpetrators to account, while Image Angel will direct victims to intimate image abuse support charities globally. Such charities will be able to approach US with criminally circulated content and if it was captured on one of our associated platforms, we will be able to offer victims the opportunity to report the perpetrator to police or flag the perpetrator to platforms who can take appropriate action by either blocking them, or removing their account access.

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In addition, through our system, once a perpetrator has been identified as associated with a previous sharing incident, they will be flagged if they try to create another account with any of our associated platforms. This gives platforms an even stronger ability to prevent repeat offending from happening on their platform.

This is critical because studies show that sexual offenders tend to reoffend. Hanson et al., 2024 showed that among high-risk adult males with a history of sexual offending, 40% of the high risk/high need (HRHN) group reoffended sexually over 20 years, while the "well above average" risk subgroup had a 52.1% sexual recidivism rate and a 74.3% rate for any violent recidivism. Drawing on 808 empirical studies, Lussier et al., (2023) found the reported percentage for sexual recidivism varied between 0 and 68%, while reaffirming the significance of intervention and rehabilitation within the sentencing process.

Rettenberger and Eher (2024) showed that reforms based on the *risk principle*—matching interventions to an offender’s risk level—led to more conditional releases and lower sexual violence recidivism, showing that evidence-based management can reduce reoffending. Similarly, by enabling early identification and accountability in image-based sexual abuse, Image Angel could support prevention and intervention efforts that align with this principle and help reduce recidivism.

Given the capabilities of our system to record perpetrator details and generate hashes, we now have the potential to develop a broader solution that tracks where and how image-based sexual abuse is occurring across platforms. The ability to measure and analyse patterns of harm would be a valuable asset. Such data could inform targeted intervention strategies, public education efforts and even platform-specific policy responses. We believe this kind of insight could form a key part of the research we publish, helping to answer critical questions such as: Why is image-based abuse more prevalent on certain platforms or in particular regions? And how can this knowledge help reduce reoffending and support victims more effectively?

Hanson, R.K., Lee, S.C. and Thornton, D., 2024. Long term recidivism rates among individuals at high risk to sexually reoffend. *Sexual Abuse*, 36(1), pp.3-32.

Lussier, Patrick, Stéphanie Chouinard Thivierge,

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Julien Fréchette, and Jean Proulx. "Sex offender

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recidivism: Some lessons learned from over 70 years of research." *Criminal justice review* 49, no. 4 (2024): 413-452.

Rettenberger, M. and Eher, R., 2024. How the risk principle reduces recidivism: The impact of legislative revisions on the release and reoffense rates of individuals convicted of sexual offenses. *Law and Human Behavior*, 48(3), p.214.

Critically, this empowers women and girls by giving **'users better control of their own experiences'** as identified in **action 7** and enabling **'users who experience online gender-based harms to make reports'** as identified in **action 8**. As we have outlined, our identification systems enable platforms to comply with **action 7**, by facilitating an **'automated blocking process'** if consumers commit this crime.

Image Angel actively engages with survivor organisations and digital safety experts to inform ongoing improvements to its technology, ensuring that its tools remain survivor-centred and ethically robust as online harms evolve. We also trigger a critical psychological shift. Perpetrators, often relying on the perceived anonymity of digital platforms, now face the real risk of identification, legal action and public exposure. In this way, Image Angel doesn't just protect content - it protects consent.

**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.

Confidential? – N

The above comments largely address this question. We support the good practice steps outlined by Ofcom, particularly those focused on governance, user safety, and proactive harm prevention. However, we believe that the guidance would be significantly strengthened by explicitly recommending the adoption of forensic, survivor-informed technologies such as Image Angel much in the same way that hash-matching is recommending, such as through StopNCII.

Image Angel offers a proven, effective solution for tackling image-based sexual abuse. Unlike other tools, it protects the entirety of visual content in a way that is resistant to manipulation, distortion, and cropping—ensuring rapid identification and appropriate action upon the discovery of harmful material. Our AWS-secured extraction infrastructure supports near-instantaneous data retrieval, and our technology can be deployed to support platforms in taking enforcement action

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against repeat offenders.

These functions directly address multiple good practice points in **Chapters 3–5**. In terms of risk, our technology is privacy-compliant, survivor-centred, and informed by expert consultation with researchers, cybersecurity and advocacy groups in digital harms and online sex work. We believe platform providers must face consequences if they don't adopt technology like ours. During oral evidence given to the Women and Equalities Committee on Tackling non-consensual intimate image abuse; Sam Millar, (Asst. Chief Constable and Strategic Programme Director of the VAWG Taskforce, National Police Chiefs Council) commented that "Everything in our threat assessment says that this will only get bigger. If it gets bigger, it gets more harmful."

Our research shows that survivors want a unified, trauma-informed resource for identifying the source of harm, rather than being required to approach multiple platforms individually. Image Angel offers that clarity, speed, and coordination. Image Angel provides a central point of contact for charities, law enforcement, and survivor advocates responding to image-based abuse and enables them to take action on the terms most favourable to the victim - as not everyone wants to begin a civil or legal case, they simply want the perpetrator blocked. Our technology allows us to search a single secure database to trace the origin of a leaked image across multiple platforms-without requiring the survivor to remember where the content was originally shared, or requiring them to visit a police station. In many cases, the image may have been consensually distributed months, or years prior to the incident being uncovered.

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**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?

Confidential? – N

We support Ofcom's proposal to publish assessments of how providers are addressing women and girls' safety, as transparency is a powerful driver of accountability. However, for such assessments to have impact, they should explicitly highlight which platforms have adopted effective protective technologies and survivor-informed solutions.

To encourage meaningful uptake of the '**good practice**' recommendations, we suggest Ofcom create a public registry of compliant platforms and establish a minimum standard for ethical governance. Requiring platforms—especially adult

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content providers—to integrate Image Angel’s tools would provide a tangible benchmark of compliance. Platforms should be assessed not only on content moderation policies but also on whether they embed proactive safeguards, such as data extraction and reporting systems, consumer education modules, and account-flagging mechanisms for repeat offenders.

Furthermore, good practice should include the engagement of survivor-led and expert-led organisations in policy and technology development. This ensures responses remain rooted in lived experience and ethical practice.

**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.

Confidential? – N

We welcome Ofcom’s inclusion of an **impact assessment, rights assessment, and equality impact assessment** in line with public law duties and **Article 10** and **Article 8** of the ECHR. However, we believe the assessments could go further in recognising the unique vulnerabilities of women, girls, and sex workers in the digital economy -particularly on adult platforms - and the critical role of forensically capable, survivor-informed technology in mitigating these harms.

Image Angel provides a concrete example of a proportionate and privacy-respecting technology that meets Ofcom’s stated objectives without infringing upon freedom of expression or privacy. Our watermarking and extraction system is embedded within platform infrastructure and works in compliance with data protection principles, data extraction can only begin if an image has been reported as non consensually shared, and cannot be viewed by anyone except the extraction team. It does not surveil lawful expression or general user activity but responds narrowly and appropriately to illegal and harmful conduct—therefore aligning with the **ECHR’s tests of legality, legitimacy, necessity, and proportionality**.

We also encourage Ofcom to consider the **equality impact** of platforms continuing to profit from user-generated adult content without mandating adequate safeguards. Women and marginalised genders—particularly sex workers—face disproportionate risk of image-based abuse and verbal misogyny. Failure to adopt protective technology exacerbates inequality by leaving victims without redress and perpetrators unaccountable. In contrast, technologies like ours

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provide an enforceable rights-protective infrastructure that helps platforms fulfil their duties under the **Online Safety Act**.

Finally, rather than imposing disproportionate costs that may be passed onto users, our service is designed to be accessible and cost-effective for platforms of various sizes, with measurable returns in user trust, brand integrity and legal risk mitigation.

**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.

Confidential? – N

N/A

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