



# Consultation response form

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## Your response

Question	Your response
<p><b>Question 1:</b> 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><b>Overview</b></p> <p>We are broadly supportive of the draft Guidance's approach to content and activity which disproportionately affects women and girls. Our research into the online experiences of children consistently show that girls disproportionately experience abuse and harassment online, and that many girls accept abuse as part and parcel of spending time online. This guidance presents an opportunity to reduce the harm that women and girls experience, as well as limiting the effect that online misogynistic content has on offline behaviours and attitudes.</p> <p>We conduct several surveys per year into the online lives of children, most notably:</p> <ul style="list-style-type: none"><li>- Our Digital Wellbeing Index (DWI), an annual study of 1,000 families which evaluates and tracks the impacts of technology on children's digital wellbeing through four key indices, and</li><li>- Our twice-yearly Digital Tracker survey, which surveys 1,000 children aged 9-17 and 2,000 parents of children aged 3-17 on their experiences, competencies and outlooks on the online world.</li></ul> <p>Throughout this response we will refer to these as 'DWI' and 'Tracker Survey' respectively.</p> <p>Like many other organisations, in our research we have seen sustained high levels of gender-based harms online for many years, driven recently in part by emerging technologies and the rise of misogynistic influencers. This response will highlight our research, which supports the Guidance's proposed approach to 'content and activity' which 'disproportionately affects women and girls'. We</p>

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	<p>also make recommendations for further inclusions in the Guidance, such as highlighting the disproportionate levels of risk and harm faced by vulnerable women and girls, such as those who receive Special Educational Needs (SEN) support, and the need for platforms to take a differentiated approach to child-on-child harms.</p> <p><b>Online misogyny</b></p> <p>We have published several reports exploring online misogyny and how it is shaping girls' experiences online, as well as offline behaviours. The findings of these reports strongly indicate that online misogyny is a vital category of content and activity in this Guidance. We outline these findings below.</p> <p>In September 2023, we published our report, 'It's really easy to go down that path': Young people's experiences of online misogyny and image-based abuse".<sup>1</sup> This report explored the rise of the so-called 'manosphere' and how male influencers, such as Andrew Tate, have fostered a culture of hatred and violence towards women and girls through pushing degrading, derogatory and outdated perspectives in their content. Alongside the rise of this content the report explored the implications of this on offline attitudes and behaviours. We found that 42% of children aged 9-16 had a favourable or neutral view of Andrew Tate: a well-known misogynistic influencer. We also found that influencers like Tate are more likely to form a favourable impression on older teenage boys (23%, compared to 10% of girls the same age) and young dads (56%) – defined as those aged 25-34. That younger dads are susceptible to this type of content is particularly worrying, given that parents are overwhelmingly who children turn to for advice or when things go wrong online.<sup>2</sup></p> <p>The success of 'manosphere' influencers like Andrew Tate largely lies in their ability to manipulate recommendation algorithms, by spreading engagement-friendly click-bait that often at first glance might not come across as misogynistic and which may not meet the threshold</p>

<sup>1</sup> Internet Matters, "It's really easy to go down that path" (2023), [link](#).

<sup>2</sup> Internet Matters, *Digital Wellbeing Index* (2025), [link](#).

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	<p>for hate speech. This enables their content to proliferate social media platforms. While steps are increasingly being taken by platforms to remove this content or to de-platform people and accounts, these messages continue to circulate – often via other accounts, such as personal accounts of members of the public, or spin-off and re-posting accounts.<sup>3</sup></p> <p>The rise in this type of content is having a detrimental effect on girls, with 39% of children and young people agreeing misogyny is being made worse by the online world. Only 9% of children disagree.<sup>4</sup> This content can significantly alter offline attitudes and behaviours and there have been instances where members of radical misogynistic communities have been linked to harassment of women, threats and acts of real-world violence.<sup>5</sup></p> <p>We found that almost two thirds of parents (64%) believe that the online world has led to more children being exposed to misogyny.<sup>6</sup> Almost half (46%) of parents think that misogyny is a serious problem online. However, many parents still think that people are exaggerating how common online misogyny is - 39% of parents of boys and 23% of parents of girls.<sup>7</sup> This demonstrates that while many parents recognise online misogyny and are concerned by it, there are many others that are still not aware of the threats posed by online spaces.</p> <p><i>Pornography</i></p> <p>We agree with the Guidance highlighting pornography as a key area which is contributing to both online and offline violence against women and girls.</p> <p>Baroness Bertin said, in the foreword to her recently published Independent Review of Pornography, that “misogynistic attitudes are on the rise, with online spaces, including some pornography sites, playing a significant role.”<sup>8</sup></p>

<sup>3</sup> Internet Matters, “It’s really easy to go down that path” (2023), [link](#).

<sup>4</sup> Internet Matters, “It’s really easy to go down that path” (2023), [link](#).

<sup>5</sup> Open University, *OU research reveals shocking level of online violence experienced by women and girls across the UK* (2023), [link](#).

<sup>6</sup> Internet Matters, “It’s really easy to go down that path” (2023), [link](#).

<sup>7</sup> Internet Matters, “It’s really easy to go down that path” (2023), [link](#).

<sup>8</sup> Baroness Bertin, *Independent Report: Creating a safer world: the challenge of regulating online pornography* (February 2025), [link](#).

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	<p>We know that viewing pornography is prevalent amongst children, especially boys and that this increases as they get older. Our latest Tracker Survey found that 5.8% of boys aged 13-14 have come across pornographic content, rising to 15.6% by ages 15-17.<sup>9</sup></p> <p>At present, children are easily able to access some pornographic sites because the age verification guardrails that they employ are simple to circumvent. While we hope the requirements under the Online Safety Act will go some way to reducing children’s exposure to online pornography, we are yet to see the effects of these new age assurance measures in reducing children’s exposure.</p> <p>The importance of this is underscored by the fact that (as the guidance highlights) research has found that one in eight titles shown to first-time users on the first page of mainstream pornography sites describes sexual activity that constitutes sexual violence.<sup>10</sup></p> <p>One factor driving this is that online pornographic content does not have the same content regulations as offline pornographic content (i.e. DVD, Blu-ray and video-on-demand). Content that is illegal offline, but which remains legal online, includes: content that shows violent sexual activity – including breath restriction (strangulation); content that shows real or apparent lack of consent; content that depicts sexual activity with adult actors made to look like children; content which depicts sexual activity between family members – such as between fathers and daughters, and brothers and sisters, and; content which shows penetration of any object likely to cause physical harm.<sup>11</sup> While Baroness Bertin’s Pornography Review made the recommendation to align online pornography content regulations with those of offline pornography, Government has yet to confirm that they will legislate for this and so it is likely that harmful online pornography will remain readily available for the foreseeable future.</p> <p>We believe that the regular presence of harmful pornographic content in popular and well-established online settings can legitimise violent and abusive sexual behav-</p>

<sup>9</sup> Internet Matters, *Digital Tracker Survey* (November 2024), unpublished.

<sup>10</sup> Fiona Vera-Gray, *Sexual violence as a sexual script in mainstream online pornography* (April 2021), [link](#)

<sup>11</sup> BBFC, *Classification Guidelines* (2019), [link](#).

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	<p>iours. There is considerable evidence that shows a connection between viewing harmful and violent pornographic content and violence against women and girls. For example, a report by the Government Equalities Office found that “pornography, alongside a number of other factors, contributes to a conducive context for sexual harm towards women”.<sup>12</sup></p> <p>Furthermore, we are concerned that the availability of harmful and pornographic content online can lower the threshold of acceptability, which facilitates users to spiral and seek out more extreme content to fulfil them – including illegal content.<sup>13</sup> For example, there is a strong correlation between watching online pornography and accessing child sexual abuse material (CSAM). The IWF have found that nine out of ten offenders stated they initially found CSAM through online pop-ups and linked material while looking at pornographic material.<sup>14</sup> Respondents to the IWF’s study described their initial engagement with CSAM as “incidental” rather than “purposive” and the step was neither difficult nor complex to take.<sup>15</sup></p> <p><b>Pile-ons and online harassment</b></p> <p>We strongly support the inclusion of this element of women and girls’ experiences online. Our research consistently shows that girls are significantly more likely than boys to experience online harassment.</p> <p><i>Contact from strangers</i></p> <p>In recent years, one of the most startling contrasts between the online lives of boys and girls has been contact from strangers. Data from our most recent Digital Wellbeing Index found that girls are more likely to be contacted by strangers than boys (31% cf. 23%).<sup>16</sup></p> <p>This is supported by research from our 2024 DWI, which found that 48% of girls aged 15-16 have been contacted by a stranger, compared to 30% of boys the same age.<sup>17</sup> Furthermore, this is an issue that is on the rise – growing</p>

<sup>12</sup> Government Equalities Office, *The relationship between pornography use and harmful sexual attitudes and behaviours: literature review* (January 2021), [link](#).

<sup>13</sup> All Party Parliamentary Group on Commercial Sexual Exploitation, *Pornography regulation: The case for Parliamentary reform* (2023), [link](#).

<sup>14</sup> Internet Watch Foundation, *New research shows action needed to stop people seeing indecent images of children for the first time* (April 2013), [link](#).

<sup>15</sup> Pornography Coalition, *Pornography coalition: Regulating online pornographic content* (November 2024), [link](#).

<sup>16</sup> Internet Matters, *Digital Tracker Survey* (November 2024), unpublished.

<sup>17</sup> Internet Matters, *Children’s Wellbeing in a digital world* (2024), [link](#).

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	<p>by 19 percentage points, from 29%, in the space of one year.<sup>18</sup> When speaking to girls about these experiences, they recalled instances of receiving messages online from men who they considered ‘weird’ or ‘creepy’. One girl aged 16 said: <i>“It’s so common I barely even think about it too much. I get loads of strangers messaging me, following me, trying to put me in group chats with other strangers. I usually exit and block, it’s just annoying.”</i><sup>19</sup></p> <p>For many girls, this sort of behaviour has become normalised and they see it, and other negatives aspects of life online discussed below, as part and parcel of being online.</p> <p><i>Online bullying and harassment</i></p> <p>As well as being more likely to be contacted by strangers, we find that girls are twice as likely to be bullied online (12.5% of girls, compared to 6.6% of boys).<sup>20</sup> Our research also shows that girls are often the recipient of hateful comments online. These comments often target their appearance and girls noted in interviews that these comments were exclusively made by males, contrary to the narrative that girls often target girls.<sup>21</sup> When we asked them about these experiences, girls were much more likely than boys to report that they had found being bullied online by people they don’t know to be really upsetting or scary (23% of girls, compared to 14% of boys).<sup>22</sup></p> <p>Given this, it is perhaps unsurprising that 43% of teen girls do not agree that being online makes them mostly happy.<sup>23</sup> We therefore support any and all efforts to minimise these currently all too common experiences for girls.</p> <p><b>Online domestic abuse</b></p> <p>This is an area which is not covered by our research.</p> <p><b>Image-based sexual abuse</b></p>

<sup>18</sup> Internet Matters, *“So standard it’s not noteworthy”: Teenage girls’ experiences of harm online* (March 2024), [link](#).

<sup>19</sup> Internet Matters, *“So standard it’s not noteworthy”: Teenage girls’ experiences of harm online* (March 2024), [link](#).

<sup>20</sup> Internet Matters, *Digital Tracker Survey* (November 2024), unpublished.

<sup>21</sup> Internet Matters, *“So standard it’s not noteworthy”: Teenage girls’ experiences of harm online* (March 2024), [link](#).

<sup>22</sup> Internet Matters, *Digital Wellbeing Index* (2025), unpublished data.

<sup>23</sup> Internet Matters, *“So standard it’s not noteworthy”: Teenage girls’ experiences of harm online* (March 2024), [link](#).

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	<p>We know that girls are frequently the victims of image-based abuse online. Girls continue to represent the great majority of victims of online child sexual abuse, featuring in 78% of images detected and removed by the Internet Watch Foundation (IWF) in 2024, where gender could be identified.<sup>24</sup></p> <p><i>Cyberflashing</i></p> <p>Our research has found that cyberflashing, which the Guidance highlights as a prevalent aspect of image-based sexual abuse, can be a serious source of distress and humiliation for girls, who are more frequently victims than boys. Our 2023 report, “It’s really easy to go down that path”, found that 11% of teenagers have experienced cyberflashing.<sup>25</sup> We found that Snapchat was a particularly high-risk platform, with over half (58%) of teenagers aged 13-16 who had received an unwanted nude image saying they had done so on Snapchat. While Snapchat was the most frequent platform for both girls and boys to receive unwanted nude images, we find that girls were much more likely to be target, with three quarters (73%) of girls aged 13-16 who had received an unwanted nude image having done so on Snapchat, compared to 39% of boys the same age.</p> <p>What is perhaps more shocking is that cyberflashing is being normalised for parents, with one parent stating: <i>“They’ve all had dick pics sent to them [...] It’s so standard it’s not noteworthy and they just block it and move on. It’s so standard she [my daughter] didn’t tell me, it has become a completely standard thing to happen to a teenager and I don’t think it has had a deleterious effect on her. You don’t feel singled out if it happens to you, because it happens to everybody.”</i><sup>26</sup></p> <p><i>Nudification tools</i></p> <p>The nature of the image-based abuse and harassment that girls are experiencing online is changing. One such example is the rise in the proliferation of nude deep-fakes: AI-generated sexually explicit images. In the space of a year, there has been a 400% increase in nude deep-fakes.<sup>27</sup> An estimated 99% of these images are of girls</p>

<sup>24</sup> IWF, *Imagery Assessment* (2025), [link](#).

<sup>25</sup> Internet Matters, *“It’s really easy to go down that path”* (2023), [link](#).

<sup>26</sup> Internet Matters, *“So standard it’s not noteworthy”: Teenage girls’ experiences of harm online* (March 2024), [link](#).

<sup>27</sup> Control AI, *Deepfakes: A call to action* (2024), [link](#).

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	<p>and women,<sup>28</sup> and ‘nudifying’ tools often don’t work on images of boys and men. While women and girls are disproportionately the victims of nude deepfake abuse, boys are more likely to have used a nudifying tool. We found that 7% of teenage boys have used a declodding app or know someone who has used one, compared to 3% of girls.<sup>29</sup></p> <p>As well as creating an environment that perpetuates misogyny, this type of abuse is already having an impact on children, especially girls. Our research found that 55% of children, rising to 60% among girls, believe it would be worse to have a deepfake nude created and shared of them than a real image.<sup>30</sup> Some of the reasons given included: anonymity of the perpetrator, a loss of autonomy, not knowing that one might have been made of you and concerns that people might think it was real. This highlights that these tools are creating fear and anxiety amongst teens. There have also already been instances of teenage boys using ‘nudifying’ apps to generate images of their female classmates. Distressingly, nude deepfake image abuse has been considered alongside the suicide of a 14-year-old girl in the UK.<sup>31</sup></p> <p>We therefore strongly support the highlighting of both generative AI and image-based abuse in the Guidance.</p> <p><b>Recommendation – include vulnerable girls</b></p> <p>Our research consistently finds that vulnerable girls – which we categorise as those who receive Special Educational Needs (SEN) support, who have a mental or physical health condition which requires professional help or who have an Education, Health and Care Plan (EHCP) – are more at risk of many harms online. For example, 80% of vulnerable girls, compared to 67% of non-vulnerable girls, reported experiencing at least one type of harm online in our latest Tracker Survey. We would therefore recommend that Ofcom outline this in their Guidance as covered in detail below.</p> <p><i>Online bullying</i></p>

<sup>28</sup> Security Hero, *State of Deepfakes: Realities, Threats and Impact* (2023), [Link](#).

<sup>29</sup> Internet Matters, *The new face of digital abuse: Children’s experiences of nude deepfakes* (2024), [link](#).

<sup>30</sup> Internet Matters, *The new face of digital abuse: Children’s experiences of nude deepfakes* (2024), [link](#).

<sup>31</sup> Metro, *‘Girl killed herself when bullies shared fake nudes of her’* (2024), [Link](#).

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	<p>A prominent difference in the experiences of vulnerable girls, compared to their non-vulnerable peers, is in online exposure to bullying. Vulnerable girls are more than twice as likely to be bullied, abused or trolled by someone they know (25%, compared to 10% of non-vulnerable girls) and by someone they don't know (18%, compared to 8% of girls without vulnerabilities). When combined, this accounts to one in three (33%) vulnerable girls experiencing some form of bullying online, compared to around one in six non-vulnerable girls.</p> <p><i>Image-based abuse</i></p> <p>Vulnerable children are also disproportionately victims of image-based harassment and abuse. For example, in 2023 we found that 14% of vulnerable girls aged 13-16 had had a sexual image non-consensually shared with them, compared to 3% of non-vulnerable girls, while 11% of vulnerable girls reported that someone had threatened to share a nude photo or video of them without their permission, compared to 2% of non-vulnerable girls.<sup>32</sup></p> <p>Our research also finds that vulnerable children generally also feel significantly more pressure to share sexual images online. A fifth of vulnerable children (23%) say that they have felt pressure to share a nude image online, compared to 12% of non-vulnerable children.<sup>33</sup></p> <p><i>Recommendation</i></p> <p>We would therefore recommend the inclusion of vulnerable girls, such as those who receive Special Educational Needs (SEN) support, who have a mental or physical health condition which requires professional help or who have an Education, Health and Care Plan (EHCP), in the Guidance under section 2.20 of Annex A (under 'Pile-ons and online harassment'), as well as in the categories of 'Online misogyny' and 'Image-based sexual abuse'. If Ofcom is not minded to include a point in these two sections on demographics most at risk, we would recommend that 'disability' be expanded upon in Section 2.4 of the 'Background', to read: 'disability, such as those who receive special educational needs (SEN) support, who</p>

<sup>32</sup> Internet Matters, "It's really easy to go down that path" (2023), [link](#).

<sup>33</sup> Internet Matters, "It's really easy to go down that path" (2023), [link](#).

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	<p>have a mental or physical health condition which requires professional help or who have an Education, Health and Care Plan (EHCP)'. The inclusion of these demographics, either in the content and activity sections outlined above or in the 'Background', would help highlight to service providers that these women and girls disproportionately suffer from these types of content and activities, which will encourage them to take action to specifically support them.</p> <p><b>Recommendation – include child-on-child abuse</b></p> <p>Our research has found that child-on-child abuse is common and, due to its complex nature, is best addressed with a differentiated approach. The dynamics, impact and types of harm associated with child-on-child abuse differ from adult offending.</p> <p>We recommend that the Guidance include suggestions for how service providers can best tackle child-on-child abuse, which recognises the serious harm and illegality of this behaviour but ensures that all children involved are adequately safeguarded.</p> <p>This could be spread across all activity categories and should include:</p> <ul style="list-style-type: none"> <li>• Measures to combat and manage child-on-child abuse cases, including sexual abuse, such as a dedicating reporting channel for child-on-child abuse.</li> <li>• Peer-reporting tools, to allow children to safely alert a platform to the non-consensual sharing of a nude image among peer groups (alongside clear information for children and parents on how this works).</li> <li>• Reporting mechanisms should prioritise cases which have been raised by children, including child-on-child cases, as children are more likely to be vulnerable to psychological harm, exploitation, or distress, and timely intervention can be critical.<sup>34</sup> Reporting mechanisms should be clear, accessible, age-appropriate, and should trigger a swift response from the platform.</li> <li>• Incorporation of preventative safety tools, such as prevention messaging and advice when the</li> </ul>

<sup>34</sup> Internet Matters, *Understanding and improving how children report online harm* (May 2025), [link](#)

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	<p>platform detects that a child account is uploading or sharing a nude image – while preserving the child’s privacy - and flagging that account as at high risk of perpetrating or being targeted by abuse.</p>
<p><b>Question 2:</b> Do you have any comments on the nine proposed actions? Please provide evidence to support your answer.</p>	<p>Confidential? – N</p> <p>We are broadly supportive of the nine proposed actions outlined in the draft guidance. We believe that Ofcom’s approach to outlining the foundational steps and the good practice steps side-by-side is a helpful and clear way of conveying information to service providers on what they are required by law to do and what Ofcom, informed by a wide range of stakeholders and research, are recommending for further action. We appreciate Ofcom’s diligence in producing a large number of measures that companies can take to tackle violence against women and girls, as well as the case studies which help outline them. In addition to the proposed actions, we have several recommendations for inclusions, which we outline below.</p> <p><b>Taking Responsibility</b></p> <p><i>Action 1: Ensure governance and accountability processes address online gender-based harms</i></p> <p>We agree strongly with the Guidance’s recommendation that service providers should look to create a media literacy-by-design policy on their platforms. Media literacy is a vital component of preventing and mitigating the harm that users, and especially children, experience online. While Ofcom’s regulation of the Online Safety Act will likely change the landscape of online safety in the UK for the better, it will not eradicate harm entirely from digital spaces and women and girls will likely continue to experience harm online.</p> <p>Children are often most at risk of encountering harm. As their ability to identify and assess risk is still developing, they also, therefore, stand to gain the most from a service provider’s media-literacy-by-design policy. Moreover, with technology changing rapidly, new challenges to online safety are regularly emerging – this can be a particular challenge for children’s online safety as children</p>

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	<p>are often some of the earliest adopters of new technologies.<sup>35</sup> It is therefore crucial that children are taught how to keep themselves and others safe online.</p> <p>As one of the stakeholders in their online lives, tech companies have a responsibility to support users, and especially children, to improve their media literacy skills.</p> <p>In Section 3.13 e), we recommend that the Guidance specify that platforms, as part of any media literacy policy, should prioritise media literacy interventions that target child users.</p> <p><i>Action 2: Conduct risk assessments that focus on harms to women and girls</i></p> <p>In section 3.19 b) and c), we recommend that Ofcom include a recommendation that service providers consider protected characteristics within these actions, or list of demographics that are more at risk, such as those from marginalised communities and women and girls with vulnerabilities (such as those who receive Special Educational Needs (SEN) support, who have a mental or physical health condition which requires professional help or who have an Education, Health and Care Plan (EHCP)). This will not only flag to service providers their potentially heightened risk of harm but will support their voices to be heard by services. Furthermore, the inclusion of this wording would ensure services design to reduce risk to woman and girls reflects the needs of many, not just some.</p> <p><i>Action 3: Be transparent about women and girls' online safety</i></p> <p>We agree that transparency reporting is an important source of online safety information for users. In section 3.26 b) we recommend that the Guidance outline that any reporting relating to sexual harassment, sexism and misogyny which service providers carry out should include both the number of reports made and the age of those who make reports. This will increase transparency and accountability and make it easier to prevent harm from occurring in the future through developing more targeted interventions based on this reporting</p> <p><b>Preventing Harm</b></p>

<sup>35</sup> Ofcom, *Gen Z driving early adoption of Gen AI, our latest research shows* (November 2023), [link](#).

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	<p><i>Action 4: Conduct abusability evaluations and product testing</i></p> <p>We strongly agree with the use of red teaming for abusability testing, outlined in Section 4.20 a). Our research last year into children’s experiences of nude deepfakes found that while most nudity sites/apps have terms and conditions which explicitly prohibit the production of deepfake sexual images featuring children, these conditions are often ignored.<sup>36</sup> Given that 99% of nude deepfakes feature girls and women, and that the Internet Watch Foundation found 3,000 pieces of AI-generated CSAM on a dark web forum in just a one month period, it is clear that the guardrails that many sites set up to prevent illegal activity are able to be circumvented. To mitigate abusability, these platforms should be conducting red teaming testing.</p> <p><i>Action 5: Set safer defaults</i></p> <p>Much of the sexual harassment that children experience online is perpetrated by adults.<sup>37</sup> We know teenage girls are contacted by adults and this is exacerbated by platform features which still suggest children as friends to adults and allow adults to easily identify children’s accounts. Furthermore, because children need to accept a message or follow request to ascertain the identity of some accounts, this can lead to them unintentionally connecting with adults.</p> <p>We also know many children evade age assurance processes by signing up with a false date of birth which can lead to them being registered as an adult: last year, we found that 84% of children aged 9-12 use social media platforms before the recommended age of 13+.<sup>38</sup> We therefore welcome all efforts to limit the extent to which adults can contact children on social media platforms (for example, default privacy settings for children, not suggesting children’s accounts on recommended follow feeds). While this would benefit all children, this would have a significant impact for girls who are more frequently contacted by strangers.<sup>39</sup></p>

<sup>36</sup> Internet Matters, *The new face of digital abuse: Children’s experiences of nude deepfakes* (2024), [link](#).

<sup>37</sup> Internet Matters, *“So standard it’s not noteworthy”: Teenage girls’ experiences of harm online* (March 2024), [link](#).

<sup>38</sup> Internet Matters, *Digital Dilemmas: Parents’ perspectives on restricting children’s smartphone and social media use* (2024), [link](#).

<sup>39</sup> Internet Matters, *“So standard it’s not noteworthy”: Teenage girls’ experiences of harm online* (March 2024), [link](#).

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	<p>In addition to the foundational step that non-connected accounts do not have the ability to send direct messages to children using a service, we recommend as a ‘Good Practice’ step the recommendation that non-connected accounts be prevented from being able to place live video calls to child users.</p> <p><i>Action 6: Reduce the circulation of content depicting, promoting or encouraging online gender-based harms</i></p> <p>We would like to highlight the efficacy of nudge techniques at the point of upload of sexual images. Last year, our report “Shifting the Dial” explored different methods to prevent ‘self-generated’ child sexual abuse among 11-13-year-olds.<sup>40</sup> One of these methods was nudges, which the children were very positive about. Children recognised the power of receiving a preventative educational intervention just prior to sending an image. Most felt that this would have a significant impact in encouraging children to re-think their decision as it would highlight the seriousness of the action.<sup>41</sup> They also felt that all messages should contain a reference to illegality of sexual images of children as they felt that many of their peers simply did not know that these images are illegal – we recommend that this be included in Section 4.40 a).<sup>42</sup></p> <p>Additionally, to prevent the spread of harmful websites among children, we recommend the inclusion, as a new Section 4.41 e), the recommendation that social media platforms automatically block the sharing of well-known pornography sites, 18+ chatbots and nudifying tool URLs in messages to and from child accounts, as well as in public spaces that can be easily accessed by children.</p> <p>Regarding further measures to reduce the circulation of harmful content, we have three further recommendations that the Guidance could include that platforms can take, centred around incorporating automated detection methods.</p> <p>Firstly, we recommend that the Guidance suggest that platforms use automated language detection to detect</p>

<sup>40</sup> Internet Matters, *Shifting the Dial: Methods to prevent ‘self-generated’ child sexual abuse among 11-13-year-olds* (May 2024), [link](#).

<sup>41</sup> Internet Matters, *Shifting the Dial: Methods to prevent ‘self-generated’ child sexual abuse among 11-13-year-olds* (May 2024), [link](#).

<sup>42</sup> Internet Matters, *Shifting the Dial: Methods to prevent ‘self-generated’ child sexual abuse among 11-13-year-olds* (May 2024), [link](#).

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	<p>content that is harmful to women and girls on platforms which are used by children, allowing this to be flagged for review and potentially removal</p> <p>Secondly, the Guidance should recommend that platforms use automated language detection to detect and block inappropriate or offensive direct messages which could also help to remove perpetrator accounts in the long term.</p> <p>Finally, to help mitigate the risk of grooming, the Guidance should recommend that platforms use automated language detection to detect messages that involve one user encouraging another user to switch their communications to more private platforms or to share their contact details, which some platforms already provide.<sup>43</sup> These are common behaviours amongst perpetrators and can help prevent grooming.</p> <p><b>Supporting Women and Girls</b></p> <p><i>Action 7: Give users better control over their experiences</i></p> <p>As outlined in our response to Question 1, many girls below the age of 18 experience frequent contact from strangers – to the point where some girls and parents consider it to be a standard part of life online. This harm could be mitigated through limiting the extent to which adults can contact children on social platforms.<sup>44</sup></p> <p>We therefore recommend that the Guidance suggest that service providers offer child users greater choice over who is able to interact with content (e.g., just people in their follow list as default) as this would provide an additional layer of protection for teenage girls from harassment and abusive interactions.</p> <p>We also recommend that, as a new bullet 5.15 g), the guidance recommend that platforms educate children on how to report and block through media literacy-by-design. Children should be supported in learning how to navigate reporting and blocking tools effectively. Platforms should offer this guidance through multiple channels, such as in-app prompts, gamified tutorials, or nudge techniques at relevant moments (e.g. after exposure to harmful content). Platforms could also consider</p>

<sup>43</sup> NSPCC, *Targeting Girls Online: How online services enable the abuse and harassment of girls* (2025), [link](#).

<sup>44</sup> Internet Matters, “So standard it’s not noteworthy”: *Teenage girls’ experiences of harm online* (March 2024), [link](#).

Question	Your response
	<p>making this age appropriate by tailoring guidance to different age groups. A seven-year-old, a thirteen-year-old and a seventeen-year-old all have vastly different cognitive and emotional capacities, and offering the same generic information risks excluding younger or more vulnerable users. In practice, this might mean providing more visual guides, and interactive or simplified formats for younger children.<sup>45</sup> Support can also extend beyond the platform, including through partnerships with schools and accessible resources for parents and carers.</p> <p><i>Action 8: Enable users who experience online gender-based harms to make reports</i></p> <p>We know that at present, girls are more likely to report content that is upsetting or that makes them feel unsafe than boys, yet reporting rates are overall low.<sup>46</sup> At present, just 36% of children who experience harm online report it on a platform.<sup>47</sup> Given this, we are wholeheartedly supportive of all suggestions to improve reporting mechanisms for users who experience online gender-based harms.</p> <p><i>Action 9: Take appropriate action when online gender-based harms occur</i></p> <p>We strongly support enforcement action, such as deplatforming influencers and accounts which share harmful and misleading information about women and girls. Although this will not eradicate misogynistic content in entirety, demonetising and de-platforming goes a long way in undermining how hate speech is funded and spread.</p> <p>Separately, our research has found that child-on-child sexual abuse often contains different dynamics to adult-perpetrated child sexual abuse. For example, child-on-child abuse can feel much more normalised, as it often takes place in school and among peer groups.<sup>48</sup> We therefore recommend that child-on-child abuse be given specific support through reporting and review channels.</p> <p>We therefore recommend that 5.25 g) be updated to read: 'Reporting channels: Creating dedicated reporting</p>

<sup>45</sup> Internet Matters, *Understanding and improving how children report online harm* (May 2025), [link](#)

<sup>46</sup> Internet Matters, *Understanding and improving how children report online harm* (May 2025), [link](#)

<sup>47</sup> Internet Matters, *Understanding and improving how children report online harm* (May 2025), [link](#)

<sup>48</sup> Internet Matters, *Shifting the Dial: Methods to prevent 'self-generated' child sexual abuse among 11-13-year-olds* (May 2024), [link](#).

Question	Your response
	<p>and review channels for online gender-based harms, including a dedicated child-on-child abuse channel.'</p>
<p><b>Question 3:</b> 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><i>Good practice steps</i></p> <p>We feel that the good practice steps laid out in the Guidance are clear and concise. We believe that the layout, which outlines the foundational steps that platforms must take to tackle online violence against women and girls, alongside the good steps that the Guidance introduces, is easy to understand for all stakeholders and easy to implement for service providers seeking to make changes for compliance and best practice.</p> <p>The proposed actions outlined in this Guidance represent significant steps that tech companies can take towards ensuring that their platforms are safe-by-design and are protecting and supporting women and girls online.</p> <p>However, we note that all elements of these good practice steps which are aimed at supporting children, such as those laid out in 'Action 5: Set Safer Defaults', and 'Action 6: Reduce the circulation of content depicting, promoting or encouraging online gender-based harms', are dependent upon platforms being able to effectively determine the age of their users. We are concerned that how age assurance will be used by platforms to keep children safe remains opaque. If highly effective age assurance is not delivered by platforms, then Ofcom should consider significant changes to the outlined Guidance to help tackle content and activity which disproportionately affect women and girls.</p> <p><i>Case Studies</i></p> <p>The case studies too set out simple examples of how platforms can implement the changes outlined in the good practice steps. We especially welcome:</p> <ul style="list-style-type: none"> <li>• Case Study 7, which makes recommendations for making GenAI platforms safer through Red Team testing.</li> <li>• Case Study 10, which outlines hash matching for CSAM.</li> </ul>

Question	Your response
	<ul style="list-style-type: none"> <li>• Case Study 11, which sets out recommendations for change to algorithms to minimise the spread of misogynistic content and content harmful to women and girls.</li> <li>• Case Study 13, which outlines nudging before uploads. We have found this to be particularly effective, as outlined in our response to Action 6 in Question 2 of this consultation response.</li> <li>• Case Study 18, which outlines how service providers can reduce the amount of violent or sensitive content that users are shown.</li> </ul> <p><i>Effectiveness of measures</i></p> <p>Regarding the effectiveness of the measures outlined in the good practice steps, we remain concerned that there is no obligation on service providers to apply the measures outlined in the guidance. This is discussed further in Question 4.</p>
<p><b>Question 4:</b> 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><b>On the Guidance</b></p> <p>We would like to set out first and foremost, our belief that this guidance should be made into a statutory code of practice. We understand that the Online Safety Act requires Ofcom to produce guidance for service providers to assess and reduce risks of harm to women and girls online.<sup>49</sup> However, we are concerned that, as guidance, it will simply not be adopted by many service providers and that the levels of online harm which women and girls face today will therefore remain high.</p> <p>We recommend that the assessment of what tech companies are doing to create a safer life online for women and girls, which Ofcom have stated they will publish around 18 months after finalising this guidance, should include a correspondence to Government containing:</p> <p>a) any proposed recommendations that may increase uptake among tech companies of the guidance to protect women and girls online, including consideration of making the Guidance a statutory Code of Practice.</p>

<sup>49</sup> UK Government, *Online Safety Act (2023)*, [Link](#).

Question	Your response
	<p>b) any learnings that may inform the Government’s wider mission to halve violence against women and girls within a decade.</p> <p>c) any support that Ofcom feels it requires from Government departments in order to improve women and girls’ experiences of the online world.</p> <p>d) an assessment of the impact that online content and activity may have on offline behaviours and actions.</p> <p>e) an assessment of whether or not legislative change should be introduced to make the guidance into a statutory code of practice.</p> <p>Furthermore, following the assessment report which Ofcom will publish 18 months after the final publication of the Guidance, we recommend that Ofcom continue to publish further reports on an annual basis. This will help ensure ongoing delivery and accountability for all stakeholders.</p> <p><b>Further recommendation - scorecards</b></p> <p>We have one further recommendation for an action that Ofcom should consider including, in order to encourage providers to follow this guidance. Based on a recommendation in the recent Youth Select Committee’s final report on its Inquiry into Youth Violence and Social Media,<sup>50</sup> we believe that Ofcom could explore options to create a consumer-facing online safety scorecard or standards rating, taking the safety of woman and girls into consideration. This would evaluate platforms on their safety measures, responsiveness to harmful content, and efforts to educate users, in relation to their adoption of this Guidance or any equivalent actions taken to the same effect. The scorecard, or standards rating, would provide users with simple, upfront information about efforts that service providers have made to support and protect women and girls, enabling them to choose safer spaces.</p> <p>This change could create a demand and incentive for further uptake of the guidance by service providers.</p>

<sup>50</sup> Youth Select Committee, *Youth Violence and Social Media* (March 2025), [Link](#).

Question	Your response
<p><b>Question 5:</b> 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>We do not have any comments on the published rights assessment or equality impact assessment.</p> <p><b>Impact Assessment</b></p> <p>We welcome the publication of Ofcom’s impact assessment alongside the draft guidance, which outlines the costs and risks that service providers will face, should they choose to undertake the recommendations contained within the guidance. Efforts to outline the costs and risks associated with following the recommendations of the guidance are especially important because this guidance is not mandatory. We therefore recommend that Ofcom undertake all efforts to ensure that this impact assessment is as robust, informative, clear and comprehensive as possible.</p> <p>At present, the impact assessment is a useful supportive resource for all service providers that may look to undertake the recommendations in the guidance. However, we believe that it could go further and we recommend that Ofcom include in the ‘potential costs for service providers’ a calculation of Business Net Present Value (BNPV), in Great British Pounds (GBP), of how much it would cost a service provider to deliver the examples of each good practice steps outlined in the assessment. This could be delivered relative to size or to organisation type.</p> <p>A clearly defined cost, or range estimate, would provide service providers with more information on the costs and risks that they are taking on to comply with the guidance and would therefore provide a higher likelihood that the guidance is adopted by as many service providers as possible.</p> <p>Calculation of BNPV is part of standard best practice when calculating impact assessments, such as that carried out recently on the Online Safety Act’s implementation.<sup>51</sup></p> <p>Including BNPV is recommended in both the regulatory impact assessment and options assessment templates</p>

<sup>51</sup> Department for Science, Innovation and Technology, *Online Safety Act: Enactment impact assessment* (October 2024), [Link](#).

Question	Your response
	<p>provided by Government departments.<sup>52</sup> The impact assessment template document states: “Costs and benefits should be monetised as far as possible, allowing for the calculation of Business Net Present Value (BNPV) which will include both direct costs/benefits and, as far as they are significant, indirect and behaviour responses (such as pass-through). Departments should also calculate policy and administrative costs of the regulation to business.”</p> <p>We believe that this would go a long way to encouraging companies to take action. It would, for example, allow trust and safety officers at tech companies to more easily present to their company boards about any proposed actions, and would support platforms’ budget making and annual planning.</p>
<p><b>Question 6:</b> 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>No response.</p>

Please complete this form in full and return to [OS-Section54@ofcom.org.uk](mailto:OS-Section54@ofcom.org.uk).

<sup>52</sup> Department for Business and Trade and Department for Business, Energy & Industrial Strategy, *Impact assessment and options assessment templates*, [Link](#).