

Response to the OFCOM Consultation on a safer life online for women and girls - practical guidance for tech companies

Background

The Lucy Faithfull Foundation is a UK-wide child protection charity that is unwavering in its commitment to preventing child sexual abuse and exploitation. We are one of only a few organisations tackling the problem at source by working with those perpetrating abuse or at risk of doing so. We run the [Stop It Now](#) helpline, the largest helpline of its kind in the world for people concerned about their own sexual thoughts and behaviour towards children and anyone concerned about child sexual abuse, and we support more than 8,000 callers who make more than 16,700 calls each year. We also operate online self-directed interventions (self-help) for those concerned about their online or offline sexual behaviour towards children, which are accessed by tens of thousands of people each year.

Annually, we assess risk in hundreds of adults and adolescents and provide group work interventions to several hundred more. Where abuse has occurred, our teams advise statutory agencies on case management and provide intervention programmes to rebuild family safety. Our preventative work includes early intervention programmes for families considered at risk of harm and public education. We also deliver training across the UK and the sector, reaching more than 2,000 frontline workers a year, including those in law enforcement, education and social care.

Our ground-breaking [Project Intercept](#) works with tech companies to deploy simple and effective warning interventions to disrupt, deter and redirect people at risk of offending online. Within Project Intercept sits our chatbot, a world-first tech tool that engages those seeking CSAM and attempts to deter and redirect them. Currently active on Pornhub UK, the chatbot and its associated static warning message have a hugely successful deterrence effect, preventing [more than 80%](#) of those who engage with it from continuing their search for CSAM.

We also work to prevent harmful sexual behaviour amongst young people through our work in schools and our programmes designed for young people themselves. This includes our website and live chat service [‘Shore’](#). The only resource of its kind in Europe and one of only three in the world, ‘Shore’ is for young people concerned about their own sexual thoughts or behaviour or that of a friend.

Our mission is simple – to prevent child sexual abuse and exploitation. It is this mission that draws all of our varied services together because child sexual abuse is preventable, not inevitable. It is with this mission in mind and more than 30 years of experience in working to prevent child sexual abuse that we have approached this consultation.

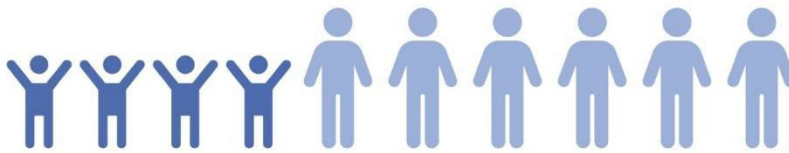
As our work is to prevent child sexual abuse, our main focus was the illegal harms consultation in 2023. We provided a detailed response to that consultation, concentrating on the mitigations for child sexual abuse material and grooming. We have also made a submission to Ofcom’s consultation on protecting children from harms online.

In this consultation, we shall limit our comments to primary priority content and prevention, the aspect of this consultation that is most relevant to our clinical expertise and our work on online deterrence with tech companies.

General observations

Children are disproportionately likely to be victims of sexual offences

Child sexual abuse in 2022/23: Trends in official data
csacentre.org.uk



They are the victims in 40% of all sexual offences



Yet make up only 20% of the population

Source: Office for National Statistics, 2023: Sexual offences prevalence and victim characteristics, England and Wales.

Centre of expertise on child sexual abuse

We must formally recognise that children represent a significant proportion of victims and ensure their specific needs are met with sufficient and appropriate support.

Children make up just 20% of the population but account for 40% of sexual offence victims ([Child sexual abuse in 2022/23: Trends in Official Data, Centre of expertise on child sexual abuse](#)). Thus, Ofcom cannot address violence against women and girls without tackling child sexual abuse. The VAWG guidance must reflect the reality of online harm to and between children.

We believe that the VAWG guidance must do more to reflect the Government's commitment to tackling online child sexual abuse. Protections should be strengthened, and effective frictions should be introduced to ensure there are no 'safe havens' for those at risk of offending. While child sexual abuse is acknowledged, the focus remains limited to existing measures under the Children's Code - this is not sufficient.

While we understand the reasoning behind separating actions into foundational steps and good practice steps, we are concerned that many of the most impactful measures for protecting children online have been placed within the good practice category. It is also disappointing that these steps – and the associated case studies - are not open to consultation at this stage, having already passed through other consultation processes.

We note Ofcom's intention to explore some of the good practice measures for future Codes of Practice and guidance. We would like to see further detail on how the Codes of Practice will be reviewed and the criteria that will be used to evaluate whether these good practice steps will be adopted into compulsory measures.

We believe this was a missed opportunity to be ambitious and to set a high bar for tech companies and service providers to ensure that women and children are safe online.

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

We consider that the elimination of child sexual abuse could be referred to as its own category of harm to specifically address the online experiences of children, including girls. We know that it has been considered within the Illegal Harms Code. However, it is important not to lose sight of the role of tackling child sexual abuse to properly eliminate VAWG.

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The proposed approach to content and activity, which disproportionately affects women and girls, focuses on the parts of the internet with which women and girls interact and have a presence. While social media sites are a significant place where harm occurs, the approach does not consider locations where grooming occurs such as gaming platforms or dating sites where single mothers may be targeted. We suggest that following the implementation of these codes there should be a rapid review of potential locations that may become safe harbours for abusers.

There are also other parts of the internet where the content and activity disproportionately affect women and girls, but where they are unlikely to have a presence such as forums and chat groups. This means that measures seeking to protect platform users are unlikely to have a strong impact on these spaces.

We welcome the intention of the three focus areas of the actions - taking responsibility, preventing harm and supporting women and girls. In particular, we applaud the preventing harm section, which seeks to prevent harm before it occurs.

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

As we have clinical expertise in prevention we have chosen to focus our feedback on the preventing harm actions (Action 4, Action 5 and Action 6). We welcome the preventing harm category, which seeks to encourage providers to act to prevent abuse and deter offending by creating platforms that are safe by design. Our work with Project intercept has engaged providers on this point and continues to support platforms in developing effective deterrence messages.

Action 4: Conduct abusability evaluations and product testing

We welcome Action 4.2b's commitment to working with experts who have direct or relevant experience engaging with and understanding the behaviours of those who have offended or are at risk of offending. This collaboration is vital for identifying the features and practices that can enable the early stages of behaviour which may lead to contact or online child sexual abuse. For example, we have found through our Stop It Now helpline that for many of our callers, viewing adult legal pornography is a significant factor in the pathway to viewing CSAM online. The people that we work with have regularly discussed how their pornography use increased over time and that they would use pornography over longer and longer durations while viewing increasingly extreme material. Further details on this topic can be found in our Faithfull paper (2024) [What's Porn got to do with it? The link between viewing adult pornography and online sexual offending against children.](#) Insights like this, from professionals who work with those who cause harm, are key to shifting interventions upstream – helping tech companies prevent harmful behaviours before they begin.

Action 5: Set Safer Defaults

We welcome the foundational steps encouraging providers to offer safer default settings for children. However, we are disappointed that this section largely reiterates existing guidance from the Illegal Harms and Children's Codes. The current focus is on helping users to protect themselves, but safer defaults should also be designed to reduce opportunities for those at risk of offending. This approach would better align with the principle of safety by design, where protective features are built in by default to limit the potential for harm across all users.

Our feedback from the Children's Code consultation remains relevant as the proposed frictions in the foundational actions currently focus solely on the child's experience. We believe this should be complemented by measures that create friction for users who may be seeking to harm children - ensuring both sides of the interaction are addressed to prevent abuse before it occurs.

However, the good practice steps also place too much emphasis on self-protection, often relying on users to opt into safety features. We had hoped for a more ambitious approach – one that explores stronger, proactive frictions directed at those seeking to cause harm. For example, introducing barriers when individuals send mass friend requests or invitations to group chats to large numbers of children

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they don't know. These kinds of measures shift the focus from children avoiding harm to actively preventing abuse from occurring in the first place.

Action 6: Reduce the circulation of content depicting, promoting or encouraging online gender-based harms

We again welcome the foundational steps which relate to child sexual abuse material. However, we are disappointed that this section merely draws together existing expectations that Ofcom has already set out for service providers. These are also limited by the pre-existing classifications in terms of functionality, risk and size.

Although we note that the foundational steps are not being consulted on, we reiterate our disappointment that the hash-matching recommendations do not apply to all medium and high-risk services regardless of size. We understand concerns that the database ecosystem would not be able to cope with levels of demand in the short term, but very much hope that the ecosystem will be able to adapt quickly to meet future demand so that the recommendation on hash-matching can become universally applicable.

In our submission on the illegal harms code we also outlined what we consider should happen once material is removed using hash-matching. Instead of an Error 404 message there is the opportunity to serve a warning to the user who tried to access the hashed image.

We believe that a warning served in place of the error 404 message when an attempt to access a hashed image is made could easily replicate what the [IWF splash page](#) for blocked URLs does in notifying the user that viewing CSAM is illegal, it causes harm, there are serious consequences but there is help to stop available confidentially and anonymously with Stop It Now services. It could take the hash matching process one important step further in preventing offending.

We particularly welcome 4.40 (a), which encourages providers to explore nudging and deterrence messaging. The mention of nudges to dissuade users from posting misogynistic or harmful gender-based content is especially important. We have already shared extensive insights with Ofcom during the Illegal Harms consultation, including our deterrence campaigns and Project Intercept, which scale the use of warnings beyond just search services and search functions. Intercept drives an average of 31,600 people a month to our self-help resources through the use of such warning messages alone. Its most successful intervention is in the file storage and sharing sector. In particular, Intercept has identified key early intervention points - such as users creating toxic usernames that signal harmful intent. By detecting and addressing this behaviour at sign-up, and signposting to support, tech companies can intervene at the very start of a user's journey - well before any harm occurs.

Additionally, our work with Pornhub on the re-Think Chatbot has shown that the existence of a warning message or chatbot to give a deterrent 'nudge' to a user engaging in illegal searches has a strong deterrent effect – around 82% of users stopped such activity after just one warning. More information on the Chatbot can be found in our Faithfull paper (2024) [Chatbots and warning messages: innovations in the fight against online child sexual abuse](#).

Question 4 - Do you have any feedback on our approach to encouraging providers to follow the 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?

The proposed approach relies heavily on providers "going further to demonstrate a commitment to women's and girls' safety". It remains to be seen what incentives there are for providers to "set themselves apart as industry leaders in this highly complex and vital space". The discussion document also noted that "while the good practice steps are not substitutes for the foundational steps, if service

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providers choose to implement these steps, this could assist providers to demonstrate compliance with the duties”.

One of the ways in which providers can be encouraged to implement the recommendations is by building a stronger evidence base for interventions. This will also help make the case for moving interventions from good practice to foundational steps, which will render them compulsory for providers. Building this evidence base requires the cooperation of tech companies to share relevant data.

However, in our experience, the majority of tech companies are unwilling to share this data. As we noted in our response to the illegal harms consultation, this reluctance to share information and provide monitoring opportunities for external organisations has made presenting a deep and varied evidence base for proposed interventions challenging. We consider that unless there are significant incentives (such as a need to report at regular intervals on improvements/new initiatives they have undertaken) it is unlikely that tech companies will share information voluntarily.

Here we can share our experiences working with providers and tech companies to address child sexual abuse material (CSAM), as covered under the Illegal Harms framework. Our deterrence-based approach has been developed over a decade of working with companies such as Google, Meta and Aylo (owner of Pornhub). Further details regarding our online deterrence campaign can be found in our Faithfull Paper (2023) [*Deterring online child sexual abuse and exploitation: lessons from seven years of campaigning.*](#)

Through IWF splash pages (for blocked URLs) and in working with technology companies such as Google, Facebook and Aylo, we developed online warning messages to be deployed when people attempt to search for child sexual abuse material or visit URLs that are known to host it. These deterrence messages warn the user of the illegality of what they are attempting to do and signpost to our Stop It Now services for help to change their behaviour.

If the technology companies that we work with accept a tracking link, we are then able to see the traffic coming through to our Stop It Now website from the intervention. However, not all technology companies that we work with will accept a tracking link. And for those that do, we can only measure impact in terms of those users who exhibit help-seeking behaviour. This is only part of the deterrent effect of these warning messages - with greater information sharing we could get the full picture. Other measures such as how often a user attempts to access CSAM, whether the user's behaviour has been altered by the introduction of an online warning, and what users do once they see one of these online warnings, are all questions that we are not able to answer but the technology companies that we work with can.

This information should be shared in the spirit of collaboration and innovation to help make the internet safer for children and to prevent child sexual abuse. Where we have open relationships with tech companies, we have produced compelling statistics and evidence for our interventions. As we have mentioned previously, when trialling our chatbot we found that just one warning was enough to stop users in 82% of sessions (periods of time spent on the website) from continuing their search for illegal content.

An information-sharing approach will help create an evidence base for interventions and tools. This will make it possible to create an evidence-based approach for moving interventions from suggested good practice guidance into compulsory actions that tech companies must take. We encourage Ofcom to exercise its powers to obtain the necessary data, which we believe exists with technology companies, to help build the evidence base for interventions.

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Question 5 - Do you have any comments on the impact assessment, rights assessment, or equality impact assessments? Please provide any information or evidence in support of your views

We would like to express our disappointment with the following statement from the impact assessment:

“Overall, we do not think the draft Guidance will impose any significant burdens on service providers. This is because the draft Guidance does not mandate any new requirements. Rather, it is framed as a call to action and sets out good practice that we strongly encourage service providers to implement.”

Throughout the consultation document, there is reference to encouraging providers to take ambitious action. However, there is a strong risk that providers will do nothing without new requirements.

We have previously called for Ofcom to strengthen the Codes of Practice to keep children safe. As we have previously expressed in our Joint Statement on Ofcom’s Approach to Keeping Children Safe Online, “Where Ofcom sets out innovative measures that set a high bar for services, we have and will continue to strongly support this.”

We would welcome an outline of how Ofcom intends to monitor, review and update this guidance.

Question 6 - Do you agree that the 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.

The Lucy Faithfull Foundation operates in Wales, reflecting the need for child sexual prevention services, including prevention of online offending. We employ a helpline operator who can speak and provide services in Welsh. We also translate resources and advertisements into Welsh. More information about our Welsh programmes can be found [here](#).

In the explanatory notes for the guidance, we note that Ofcom encourages tech companies and service providers to consider their users’ language. We consider that technology companies and service providers should seek to use the tools at their disposal such as language detection when developing prevention and deterrence methods.

Further Comments

We believe there is a clear need to examine the intersection between the Children’s Code and this draft guidance - specifically to assess how the regulatory framework protects girls and young women online, and what frictions are in place to deter or prevent those at risk of offending from engaging in abuse.

As we have previously noted in our response to the Illegal Harms consultation, nudges and prompts are commonplace when it comes to detecting fraud or preventing data breaches. We strongly advise that similar frictions should be mandated to disrupt the ability of people who have offended or are at risk of offending to contact children. Frictions targeted at those who are at risk of causing harm, combined with default settings on children’s accounts and measures that give children the ability to block, mute, decline and report, would together provide a more comprehensive package of safety measures for children.

Once implemented, we would also welcome a future review of both the Children's Code and the VAWG guidance to assess how the overall regime supports children's safety online.

Conclusion

We welcome Ofcom's progress on implementing the Online Safety Act and the draft codes focused on protecting women and girls, which lay a foundation for future improvements.

However, more can and should be done to strengthen these protections:

- **A broader strategy** that recognises this violence affects women and children - not just girls.
- **Stronger deterrents** directed at preventing those who have offended or are at risk of offending from causing harm, promoted as good practice and embedded as standard in future codes.
- **Clear incentives and penalties** aligned with Ofcom's enforcement powers to drive adoption of measures that prevent harm before it happens.

We also wish to reiterate that while we understand Ofcom's requirement to establish an evidence base prior to making recommendations, this presents a struggle for civil society organisations who often do not hold or control the evidence that would assist Ofcom. Consultations on future iterations of codes of practice need to reflect this.

We would be happy to discuss any aspect of this response in more detail.

23 May 2025