



Your response

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<p>Question 1: Do you have any comments on our proposed approach to 'content and activity' which 'disproportionately affects women and girls'?</p>	<p>Confidential? – Y / N</p> <p>We appreciated the emphasis on narrowing the focus in the guidance towards distinct harms that disproportionately affect women and girls, including abuse. Generally, we believe that is a fitting approach towards guidance of this sort. Although not the subject of this guidance, we also feel it is important to draw your attention to harms which affect men and boys. Increasingly, boys are victims of online financial sexual exploitation and it is important that boys are not forgotten victims of online harms. We note that the guidance mentions how abuse of women and girls online can perpetuate misogyny and contribute to radicalisation of men and boys (for example: p30, paragraph 2.64). Given this acknowledgement of men and boys, we feel the document would benefit from some recognition of the harms that boys may also experience in the online realm, even if not the primary subject of the guidance. Financially motivated sexual extortion is a key area of risk for boys and men online. We are concerned that male victims are routinely sidelined in discussions around needed improvements to harm and risk reduction online.</p> <p>Three of the four main harm areas that the guidance purports to address (p13, consultation document) are represented in our direct work with victims and survivors of Technology-Assisted Child Sexual Abuse (TACSA). (Note: online domestic abuse is not an area we engage with, therefore we will not comment on this aspect). In particular, we have supported victims who have experienced 'pile-ons and online harassment'</p>

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	<p>following an experience of TACSA. This has included the non-consensual sharing of images, usually within a school context, followed by harassment, abuse and ridicule from those who have seen the imagery. The impact on victims is profound. We therefore agree that the approach towards content and activity, including these harm areas, is appropriate. Furthermore, we fully agree that the harms can be ‘systemic and intersectional’ (p14, 2.13). Overall, we feel the guidance covers the relevant areas and displays a good appreciation of the forms of harmful content and activity.</p> <p>Although we attended several general events hosted by Ofcom on this release of this guidance, we note that there was also a round of stakeholder engagement. We believe we would have been able to offer useful input and feedback to Ofcom during this, but we were not invited for input. This is surprising given the nature of our work. We would ask for Ofcom to keep us in mind for future engagement in areas relevant to our work (Technology-Assisted Child Sexual Abuse, including direct work with victims, families and lived experience participation).</p>
<p>Question 2: Do you have any comments on the nine proposed actions? Please provide evidence to support your answer.</p>	<p>Confidential? – Y / N</p> <p>We feel the three intervention domains, with related action points, are rational and well-justified. In reading this section, specifically the good practice steps, we found ourselves in broad agreement and support of the proposed actions, including the rationale offered for these. Given the case and clarity made for the nine good practice steps actions, we have to question why some they are only suggested as good practice, rather</p>

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	<p>foundational, baseline steps to achieve maximum safety for women and girls online.</p> <p>Additional comments on this point are made within the following question sections.</p>
<p>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.</p>	<p>Confidential? – Y / N</p> <p>It is wise to provide illustrative examples of the good practice steps in action via the case studies. We welcome this, as it will bring definition (and inspiration, hopefully) in how providers may explore implementing the good practice steps.</p> <p>We were particularly convinced by section 2.69 (pp31-33) on persuasion, reduction and removal. While we note that Ofcom intend to consult on further measures on this topic later this year, we felt the case for effective use of these three strategies was well made out. Utilising persuasion techniques (e.g. nudges), reduction through downgrading content (etc.) and removal of harm via hash-matching and layering prevention techniques and removal would seem to be both crucial and effective in creating a safer online experience for women and girls. We believe it is important these good practice steps are therefore rolled out as foundational steps. (We discussed the process of codifying these measures under our response to question 5). Specifically, research on the ‘Online Disinhibition Effect’ is convincing in showing how it can be promotive of harmful and illegal behaviour online (Suler, 2004). These good practice steps are too valuable to remain as recommendatory only.</p> <p>We felt there were some excellent, robust options under Action 7, for better user control in</p>

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	<p>their online engagement (p33, 2.75). We endorse these options and reiterate the need for appropriate and obvious signposting for support. This is particularly important for children, and should be clear and in accessible, child-friendly language.</p> <p>The recommendation for users to offer feedback on their experience with provider reporting mechanisms is welcome (p35, 2.78). This enhances provider accountability, from the user experience and perspective.</p> <p>The ability to report off-service abuse is also important (p36, 2.78). We know from our direct work with victims that abuse often migrates from the online space where it was first encountered, towards other arenas. Including reports of off-service abuse could contribute to identification of trends in harmful and potentially migratory behaviours, seeding into functionality/service improvements, over time.</p>
<p>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?</p>	<p>Confidential? – Y / N</p> <p>We are extremely supportive of Ofcom’s proposal to publish an assessment of how providers are enacting measures to address and improve safety for women and girls online. This is a welcome form of transparency and accountability, even in the absence of full enforcement protocols for the entirety of the actions noted in this guidance. While we appreciate that an assessment requires a period of monitoring beforehand, (thus delaying an assessment to 2027), we also believe Ofcom’s assessment publication should not be a one-off event, eighteen months after the guidance is finalised. We encourage Ofcom to commit to a yearly assessment on how providers are keeping women and girls safe on their services.</p>

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	<p>This will permit ongoing monitoring and public accountability for providers, ensuring they cannot stagnate in their endeavours to improve online safety and harm reduction for women and girls.</p> <p>We question whether the ‘urgings’ of Ofcom, as noted at paragraph 2.85 (p38), will be enough to push providers to explore and implement some/all of the good practice steps outlined in the guidance. We are not convinced that attempts at persuasion will be sufficiently compelling upon providers, who may not wish to go beyond minimum requirements to comply with the Online Safety Act and regulatory regime (including Codes published to date). We hope that Ofcom’s proposed assessment publication will counteract any provider indifference towards the urging of good practice steps.</p>
<p>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.</p>	<p>Confidential? – Y / N</p> <p>We appreciated that the broader context and rationale for the various forms of assessment was offered within the guidance document itself, as well as the distinction over where corresponding aspects of such assessments are located.</p> <p>We were interested to note that Ofcom clearly indicates that the draft VAWG guidance “does not mandate any new requirements” on service providers (p45, A2.4). This was a surprisingly frank statement, at the end of a lengthy guidance document which purported to outline how providers could improve online safety for women and girls. Following this statement, we question the overall value and impact of this guidance, if it does not actually contain anything new, actionable (or enforceable) in the realm of reducing online harms to women and girls. Although we recognise the</p>

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	<p>OSA outlines that Ofcom must attend to guidance in this area (S.54, OSA), and the draft has been framed as a “call to action” (p45, A2.4), we wonder how effective the guidance will be in realising improved safety conditions for women and girls online, without any mandatory components. We would encourage Ofcom to revisit the guidance sooner rather than later, exploring the areas that are most conducive to codification, (as mentioned in footnote 38, p16), to strengthen their impact and enforceability. We note this was also suggested by attendees and discussed during Ofcom’s presentation of the guidance to the Online Safety Act Network on 27.02.25. While we appreciate that this may not be possible until the next version of the Codes is released, we strongly encourage Ofcom to consider “lifting and shifting” some of the incredibly valuable and defensible good practice steps included in this draft guidance, towards inclusion in the corresponding code area. Although the evidence threshold for codifying measures may be higher, we believe that across the sector, including academic research, there is ample justification and evidence for upgrading the good practice steps into full code measures. This conversation was also revisited by participants to the Q&A during Ofcom’s introductory webinar (A safer life online for women and girls) on 13th March 2025, suggesting that stakeholders see an important and urgent priority for the good practice steps to be made more robust, even though this requires further statutory processes to do so.</p> <p>We have nothing further to add about the assessments.</p>
<p>Question 6: Do you agree that our draft Guidance is likely to</p>	<p>Confidential? – Y / N</p>

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<p>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>This is outside our purview and remit, so we have nothing to offer by way of response.</p>

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