Consultation response form

Your response

Question	Your response
Question 1: Do you have any comments on our proposed approach to 'content and activity' which 'disproportionately affects women and girls'?	**General Comments** The Mayor of London welcomes OfCom's clear recognition that women and girls face unique, serious, and disproportionate risks online. We support OfCom's assertion that online gender-based harms are systemic, intersectional, exacerbated by social norms, and co-occur or overlap with offline harms. The Mayor is clear that online gender-based harms – and broader technology-facilitated Violence Against Women and Girls (VAWG) [tech VAWG] – is part of a continuum of violence with offline abuse, rooted in gender inequality. The physical world's biases and inequalities, including the under-representation of women within the tech sector, are replicated through technological design. Online spaces then reproduce "controlling and restrictive conceptions of gender... which are then repetitively reinforced" and can introduce new forms of gender-based discrimination.[1] Victim/survivors of gendered online harms and tech VAWG suffer significant impacts on their mental and psychological health. These detrimental effects can be as serious as the impacts of 'offline' violence.[2]

[1] Clementine Collett and Sarah Dillon, 'AI and Gender: Four Proposals for Future Research', University of Cambridge: Leverhulme Centre for the Future of Intelligence, 2019. Available at: AI_and_Gender___4_Proposals_for_Future_Research.pdf , 4

[2] [3] Clementine Collett and Sarah Dillon, 'AI and Gender: Four Proposals for Future Research', University of Cambridge: Leverhulme Centre for the Future of Intelligence, 2019. Available at: AI_and_Gender___4_Proposals_for_Future_Research.pdf , 4

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	As technology and online spaces become intertwined with almost every aspect of our lives, victim/survivors cannot simply 'switch off' when experiencing online harm – nor should they be expected to. As digital and technology capabilities advance, so too will the potential to perpetuate new forms of violence against women and girls. Collaboration across sectors, including tech, policing, civil society, and Government, is therefore essential to tackle perpetrators of tech VAWG and prevent harm from occurring. We fully support OfCom's emphasis on robust safety-by design and harm prevention to discourage perpetrators from enacting harm in the first place. But the Mayor stresses that technological intervention must go hand-in-hand with changing the harmful attitudes and behaviours of men and boys, empowering people to challenge harmful narratives, learn about healthy relationships, navigate digital environments safely and seek support when affected by VAWG. The Mayor has a key role to play in tackling this issue through funding services and preventative education, overseeing record investment of £233 million into tackling VAWG and its root causes across London. The Mayor and wider regional leadership nationally play a vital role in bridging the gap between national government and the police, local and grassroots VAWG sector organisations, schools, and youth services that are at the forefront of responding to the impact of emerging online harms. Insights from our engagement with these stakeholders underline the critical need for specialist tech training for the frontline workers that sup-

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	port victim/survivors alongside sustainable funding that upskills policing identification of and enforcement capabilities of online crimes. The Mayor therefore seeks clarification from OfCom and Government around: <u>Accountability</u>: • Given the voluntary nature of much of this guidance, how does OfCom and Government intend to hold tech companies to account for implementing its recommendations? • How will OfCom ensure women and girls' voices are represented within any accountability governance structures? • How does OfCom and the Government intend to approach prevention of and intervention of tech VAWG perpetrated through the Internet of Things? • How will the take-up of the 'good practice' guidance be monitored and shared across the tech sector? • Will this guidance be reviewed and updated at regular intervals to reflect the pace of emerging online harms and risks? • The NPCC's VAWG Strategic Risk Assessment highlighted the need for an improved police digital forensic response to tackle gaps in capability and capacity. This would enable the police to better respond to tech enabled VAWG, including through the processing of digital evidence, and hold perpetrators of online gender-based harms to account. [3] What

[3] NPCC, Violence Against Women and Girls Strategic Threat Risk Assessment 2023, violence-against-women-and-girls---strategic-threat-risk-assessment-2023.pdf, p4.

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	is the Government's plan to upskill the police's digital response and capabilities? <u>Supporting victim/survivors</u> • What plans do OfCom and/or the Government have to support victim/survivors of gendered online harms (both illegal and non-illegal), including any funding for victim-support services? • Gendered online harms and wider tech VAWG is in scope of a wide range of departments, agencies and public bodies – including the Home Office, Ministry of Justice, and Department for Education. How will OfCom and the Government foster collaboration to prevent and tackle gendered online-harms and wider tech VAWG? ○ How will the Government's strategies to support victims of crime and funding for the criminal justice system and policing reflect the growing need for prevention and intervention in this area? • The VAWG sector and victim/survivors' feedback is essential to ensure tech companies apply these recommendations appropriately. The Government must ensure they are involved where appropriate and that victim/survivors and the sector are paid for their expertise. What funding may be available from the Government to facilitate their involvement? <u>Information-sharing</u> • Information sharing is often a barrier (real or perceived) to keeping victims safe and reducing repeat victimisation from perpetrators. It is a common theme and recommendation from Domestic

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	Abuse Related Death Reviews (previously Domestic Homicide Review). What mechanisms will be put in place to ensure effective information-sharing between policing, tech platforms, and OfCom to tackle perpetrators of gendered online-harms effectively? ○ Perpetrators of online abuse can often be perpetrators of abuse offline and may be involved in wider criminal or extremist activities. What mechanisms can be put in place to ID and flag these perpetrators between platforms and with the police? **<u>Comments on categories of Online Harm</u>** • OfCom should strengthen its acknowledgement of the underrepresentation of women within the tech sector and how this contributes to the reproduction of bias within technological design. We suggest OfCom and/or Government should champion increasing greater representation of women within the tech industry, which could include developing workforce recruitment and retention guidance. • In gendered crimes such as stalking, individual incidents (e.g. a perpetrator sending a picture of the victim's place of work) may not meet the criteria for 'illegal' but – seen in the context of a pattern of perpetrator behaviour – are deeply distressing, threatening and abusive to the victim/survivor. We are concerned that a great deal of harmful content (which doesn't obviously fit within the illegal category) will therefore remain online, to great distress for victim/survivors. We encourage OfCom to strengthen its guidance for tech platforms to understand

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	these nuances of abuse in victim/survivor experience. ○ For example, a victim/survivor story shared with the Mayor's Office for Policing and Crime (MOPAC) highlighted that she reported fake accounts created by her ex-intimate partner on a social media platform, to spread malicious claims about her. However, the platform did not take down the accounts as they did not meet the threshold of violating their terms of service but clearly caused deep distress to the victim/survivor and when viewed as part of a holistic pattern of behaviour, formed part of the stalking case against the perpetrator. • We welcome OfCom's clear framing around gender-based online harms disproportionately impact women and girls. However, we suggest more acknowledgement of how economic income and ethnicity can impact users' abilities to access safety features that can help protect them online – technology poverty is widely evidenced among minoritised communities.[4] • We suggest more reference to the intersection between so-called honour-based abuse (HBA) and gendered online harms, particularly intimate image abuse (including deepfake abuse) and the disproportionate impact of this on minoritised women and girls. Fear of honour-based abuse can deter minoritised

[4] Digital Poverty, Limited Digital Literacy and Inadequate Language Support are Impeding Minoritised Ethnic Communities' Access to Digitalised Services – Digital Poverty Alliance

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	women from reporting intimate-image abuse.[5][6]
	
	• We welcome OfCom's acknowledgment that harms evolve rapidly and expectation that providers regularly review what they may need to do to effectively respond to emerging threats and risks. However we suggest that OfCom explicitly references the following emerging harms:
	  ○ Virtual rape or "meta-rape"[7]
	  ○ The exploitation of facial recognition technology (FRT), such as freely available FRT search engines including "PimEyes". Commercially available FRT has been highlighted as being used to identify and dox porn actresses and sex workers,[8] as well as facilitate stalking.[9]
	  ○ Financially-motivated sexual exploitation (so-called 'sextortion')
	  ○ Romance fraud or so-called 'pig butchering' scams, which disproportionately target older people.[10]
	
	• We also suggest the guidance is updated to include Doxxing, a long-standing harm which is evidenced as a gendered crime disproportionately impacting women.[11]
	
	• We suggest more reference to the impact of gendered online harms (including

[5] Amina, The Muslim Women's Resource Centre Exposed – Amina
[6] Pakistan: Woman killed after being seen with man in viral photo - BBC News
[7] Clare McGlynn, Carlotta Rigotti, "From Virtual Rape to Meta-rape: Sexual Violence, Criminal Law and the Metaverse", *Oxford Journal of Legal Studies*, 2025; https://doi.org/10.1093/ojls/gqaf009
[8] Kashmir Hill, 'Your Face Belongs to Us: The Secretive Startup Dismantling Your Privacy', (2023).
[9] Stalking fears over PimEyes facial search engine - BBC News
[10] Elderly Romance Scams - Action Fraud Claims Advice
[11] Lack of legal protections against doxing is putting women at greater risk of online stalking and harassment - Equality Now

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	pro-suicide and self-harm messaging) on vulnerable groups, including people with poor mental health. • We welcome the reference to misogyny influencers' impact on boys and young men. We suggest this is strengthened through reference to the so-called 'femosphere' and 'trad wife' content and its impact on influencing young women and girls.[12] We would expect to see more links made with the wider context of 'Incel' culture and content that can encourage abuse, harassment, stalking and promote femicide. • We welcome the good practice guidance around GPS tracking but encourage greater reference to and guidance around the co-occurring nature of online abuse with the Internet of Things. The use of Smartwear to perpetuate domestic abuse, stalking, and wider VAWG is well-documented.[13] The NPCC's (NPCC) 2023 VAWG Strategic Risk Assessment outlined the risk to women and girls of haptic suits, in context of the metaverse, providing additional opportunities to commit VAWG.[14]
Question 2: Do you have any comments on the nine proposed actions? Please provide evidence to support your answer.	**Action 1** • We would welcome more information about how tech companies' governance, accountability and transparency can feed into existing public safety structures. The Mayor's Violence Reduction Unit (VRU) holds an Online Harms Steering Group,

[12] Welcome to the femosphere, the latest dark, toxic corner of the internet… for women | Feminism | The Guardian`

[13] Connected technology: MPs call on Government to tackle growing problem of tech-enabled domestic abuse - Committees - UK Parliament

[14] violence-against-women-and-girls---strategic-threat-risk-assessment-2023.pdf

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	formed of practitioners, young people, charities and researchers, and a quarterly oversight and delivery reference group, consisting of local government, health, education, police and community organisations. Regional governance can support Ofcom to encourage adherence to guidance and share best practice. **Action 3** • In 3.12, we suggest that providers directly incorporate the views and experiences of victim/survivors and other communities disproportionately affected by online harms, including young people. This could be through a victim voice forum. **Action 4** • Abusability evaluations should be conducted with input from the VAWG sector as best-practice. **Action 6** • We encourage OfCom to update the guidance to include language that ensures social media companies must design their users' feeds and advertising mechanisms so that pornographic content doesn't appear automatically. There must be a working presumption that, regardless of age-verification measures, children will be able to access social media sites (for example, through VPNs) and therefore legal adult content should be automatically barred from feeds as it is still harmful to children. • We greatly welcome the range of 'good practice' steps outlined to reduce the exposure and impact of harmful content. Consultation with young people in London through the VRU has highlighted the

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	need for empowerment over managing social media feeds and improved functionality that limits exposure to harmful content. For example, participants in consultations proposed AI-driven nudges, as recommended in this guidance, that prompt users to reframe potentially harmful comments into more constructive messages. Young people expressed the need for stronger verification processes on social media platforms to build trust and reduce the likelihood of anonymous abuse. They also called for a more human-centred approach to reporting, with access to trained youth workers rather than automated systems alone. **Action 7** • We welcome the approach outlining what blocking should entail i.e. a full prevention of one account viewing or interacting with the blocking account. However, Twitter/X has recently allowed blocked users to view the content of the account that's blocked them, just not interact with it. Will preventing this action by them be unenforceable as a result of this guidance?
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.	• While a focus on technical intervention and platform governance is crucial, it should be complemented by relational and educational responses that address root causes and long-term impacts of online harm. • We encourage Ofcom to further emphasise the need for prevention and education in digital and tech strategies, with interventions delivered in community spaces and in education settings. Media

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	literacy should form part of a more comprehensive prevention and education strategy. It is essential to empower people to challenge harmful narratives, learn healthy relationships and navigate digital environment safely. This should include training and awareness raising to equip parents, carers and other trusted adults who work with children with the knowledge and skills needed to support young people navigate the online world safety. Online harms training programmes run by the VRU for trusted adults are a successful example, with 99% of participating practioners saying they would use the knowledge they had gained to safeguard young people. • The VRU has learnings and evidence that Ofcom can build on which emphasise the importance of human-centred support alongside digital safeguards. Mentoring and safe space provision are critical components in the recovery and resilience of those impacted by online harms and prevention of re-victimisation. Young people have voiced frustration with inadequate or automated reporting systems on social media platforms. They seek more robust aftercare and access to trusted adults when navigating harmful online experiences. These insights support the need for tech interventions to be embedded within broader ecosystems of care and support.
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	• We echo concerns of many in the VAWG sector that guidance alone may not go far enough in holding platforms to account and future-proof against emerging online harms.

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providers to take up the 'good practice' recommendations?	• We support the VAWG sector's calls for a statutory code of practice, with clear consequences for non-compliance. • We also encourage OfCom to promote the role of regional government and local partnerships in encouraging platforms to engage with the guidance meaningfully. Through our networks, including our wide range of commissioned services and stakeholder forums across London, we can help surface emerging issues, share good practice, and promote co-designed responses. • We also encourage Ofcom to consider how public transparency (e.g., publishing assessments of platform safety practices) can incentivise change and elevate the voices of affected users.
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.	• We welcome OfCom's impact and rights assessments. • We suggest OfCom could adopt a broader scope of "impact" that recognises not only the immediate consequences of exposure to harmful content but also its long-term, systemic and cultural effects. Research led by the VRU shows that repeated exposure to violent or misogynistic content can shape social norms, increase desensitisation, and foster fear. These effects are often gendered and racialised.
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	N/A

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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.	

Please complete this form in full and return to OS-Section54@ofcom.org.uk.