

Your response

Question	Your response
<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? – N</p> <p>OFCOM's starting position of this consultation is completely invalid, as it falls at the very first hurdle: a supposed disproportionate victimisation of women & girls. There is, conversely, much evidence of a disproportionate impact on men & boys, and certainly of far more balance of victimisation according to sex.</p> <p>* Online harassment was more of males (43%) than females (38%) in the USA in 2021; 44% v 37% in 2017, with men more likely to be called offensive names (30% v 23%) or to have received physical threats (12% v 8%) [<i>The State of Online Harassment</i>, Pew Research (2021)]</p> <p>* Of online intimate image abuse reports, 59% were by men in Australia in 2021-2022 [eSafety Commissioner, eSC website 26/10/22]</p> <p>* 'Sextortion' victims were 91% male in the UK in 2024, prompting the NCA to launch a campaign targeting males to increase their awareness [National Crime Agency (2024)]</p> <p>* Harassment of journalists in some categories (sub-types) is more of males and in others more of females, roughly averaging out, in what is the most detailed research to date on this topic [Thurman et al (2025). UK Journalists in the 2020s, <i>Reuters Institute</i>] Of those suffering the most extreme retribution (being killed), in 2024 89% were men; only 11% were women. [International Federation of Journalists (IFJ)]</p> <p>– Note it is likely in particular the feminist ideological writings by women that attract abuse, rather than the female journalist herself per se.</p> <p>* So-called pile-ons are experienced by 20% of males but only 15% of females, according to OFCOM itself.</p> <p>Not only has OFCOM wilfully (dishonestly) ignored key data showing men & boys and not women and</p>

Question	Your response
	<p>girls to be disproportionately the victims and/or impacted in regard to the various forms of on-line harm cited: OFCOM has also totally failed to factor in heavily male-preponderant <i>under-reporting</i> (and female-preponderant <i>over-reporting</i>); not even to mention it, indeed.</p> <p>The upshot is that even if you cherry-pick data – of largely female victimhood when studies show a range across to largely male victimhood, with studies in the middle showing a rough balance – <i>it would show predominantly male victimhood and impact as soon as data were weighted according to some informed estimate of sex-differential under- and over-reporting.</i></p> <p>This notably applies in the case of partner violence/abuse. The raw data show roughly 40% of victims being male, but this is a huge under-count, given that even the ONS recognises heavy male under-reporting relative to female: only 12% of male victims report, whereas 25% of female victims do. The preponderance of male over female partner violence/abuse victims is far greater still if were to be factored in female over-reporting.</p> <p>MALE UNDER-REPORTING, FEMALE OVER-REPORTING</p> <p>There is a huge sex differential in the reluctance of males compared to females to seek help in any context where it has been investigated (Vogel & Heath, 2016; Yousaf, Grunfeld & Hunter, 2015; Möller-Leimkühler, 2002), including even when suicidal (Rasmussen, Hjelmeland & Dieserud, 2018). Regarding all forms of crime, male comparative under-reporting is the principal predictor of the likelihood or not of reporting a crime (Avdija & Giever, 2012). It is highly indicative that even regarding violent assaults, in marked contrast to women “men victimized by strangers most often do nothing” (Kaukinen, 2002).</p> <p>Conversely, there is good reason to suspect a major sex differential in the opposite direction in regard to <i>over-reporting</i>, given that vulnerability confers sexual attractiveness to females (Goetz, Easton, Lewis & Buss, 2012; Rainville & Gallagher, 1990), whereas for males it undermines status, thereby instead reducing their sexual attractiveness. It is the implicitly felt threat to status males feel in revealing any form of victimhood that underpins its male-preponderant under-reporting.</p>

Question	Your response
	<p>[END OF SUB-SECTION ON MALE UNDER-REPORTING]</p> <p>In any case, OFCOM is not even revealing the suspect data it relies upon. In 2.34 you state this is in a review, <i>Statement of Online Harms</i>, but there is no link to this in the consultation document and it's nowhere to be found on the OFCOM website: and OFCOM itself could not find it when I contacted to enquire. Based on this supposed outline of evidence, it is stated (2.34) that you go on to find illustrative “case studies”. But case studies are merely anecdotal, and can be selected to unjustifiably set up any position, however removed from reality.</p> <p>OFCom's non-scientific approach to evidence gathering is further shown at 2.13: “All four kinds of online gender-based harms are both systemic and intersectional. They are driven by longstanding forms of misogyny, sexism and gender-based violence which also intersect with other factors ...”</p> <p>This is a completely non-scientific, entirely ideological statement, with no scientific sources in support of supposed disproportionate female victimisation cited in the footnotes, and is contradicted by all of the pertinent scientific research. Misogyny and any notion of predominantly anti-female sexism is ideological invention [Moxon, S.P. (2018). 'Misogyny has no scientific basis of any kind: the evidence is of philogyny—and misandry'. <i>New Male Studies</i> 7(2), 26-42] It is in fact the male who receives the great bulk of negative attitudes [Moxon (forthcoming) 'As the Basis of Prejudice or Bias, Not Race but Sex (Gender) is Salient and in the 'Wrong' Direction – Critical Social Justice Theory Identity Politics is Debunked'; Connor, Weeks, Glaser, Chen & Keltner (2023) 'Intersectional implicit bias: evidence for asymmetrically compounding bias and the predominance of target gender'. <i>Journal of Personality and Social Psychology</i> 124(1); Steele & Lipman (2023) 'Children's implicit attitudes toward targets who differ by both race and gender'. <i>Developmental Psychology</i> 59(5); Veenstra (2013) 'The gendered nature of discriminatory experiences by race, class, and sexuality: a comparison of intersectionality theory and the subordinate male target hypothesis'. <i>Sex Roles</i> 68 (11-12); Moxon (2019) 'The falsity of identity politics: negative attitude is towards males who are different, in policing sexual access by gate-keeping group membership'. <i>New Male Studies</i> 8(2).]</p> <p>How OFCOM got itself into such an indefensible position is indicated in the list (the footnotes of p9) of</p>

Question	Your response
	<p>organisations represented at the first and second workshops: all either women's, feminist or CSJ DEI captured. Not one organisation involved has other than an ideological bent if not prime purpose, and none are scientific bodies. So there is little possibility of the falsity of initial assumptions being questioned. OFCOM is methodologically wilfully biased in the extreme.</p>
<p>Question 2: Do you have any comments on the nine proposed actions? Please provide evidence to support your answer.</p>	<p>Confidential? – N</p> <p>In respect of proposed action 1, 'Governance and Accountability processes address online gender-based harms', these must address harms to men & boys, these being indeed <i>gender-based</i>: misandry (which science literature reveals to be the actual negative attitude in respect of sex, not misogyny). Albeit not directly enacted by Section 54, nevertheless, not to act to protect men & boys from harm would be to discriminate against them, contravening the Sex Discrimination Act, the Equality Act, and the Human Rights Act.</p> <p>The same applies to proposed action 2, 'Conduct risk assessments that focus on harms ...' Any such risk assessments should also include harms to men & boys, otherwise this will require providers to perpetrate sex discrimination, and in this OFCOM itself will have flouted the law in its function as a public body.</p> <p>Without including men & boys' safety in relation to proposed action 3, 'Transparency', men & boys and the females associated with them – everybody, pretty well – will lose confidence in OFCOM.</p> <p>There must be objection to proposed action 6, 'Reduce the circulation of content depicting, promoting, or encouraging online gender based harms', is for the reasons re 1. Much content is being mistakenly classed as gender-based harms towards women, when instead it is gender-neutral impact, or more harmful to men. It is of course quite ludicrous to broaden the concept of harm to encompass mere dislike and gratuitous objection, as this destroys freedom of expression: it is draconian, and blocks free speech. By any view it is disproportionate to further ratchet up censorship.</p> <p>This issue of course extends to proposed action 8, 'Enable users who experience online gender-based harms to make reports'. Well over-the-top restriction</p>

Question	Your response
	<p>on free speech is on the cards with a reporting system that accepts as 'gender-based' and 'harm' something that a person merely objects to, rather than it being in any apparent sense harmful to them. Just as there has never been a right generally not to be offended, there never should be such a right that is gender-based.</p> <p>It follows that proposed action 9, 'Take appropriate action when online gender-based harms occur', is objectionable.</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? – N</p> <p>Hardly can 'good practice' be effective and suitable given dire evidence quality, absence of gender balance and the active sex discrimination entailed. How other than gender bias in framing and implementation could ensue from minimal if any recognition of the risks and harms experienced by men & boys? It's sex discrimination plain and simple.</p> <p>The case studies in Chapter 5 are framed exclusively in terms of female users, without acknowledging gender-neutral tools or practices that support <i>all</i> users. What about male victims of domestic abuse – in the majority in most studies, and in all were male under-reporting to be factored in – misandry (the actual problem in society, not misogyny), sexual extortion (males overwhelmingly the victims), and false allegations (vastly under-estimated)?</p> <p>It hardly can be good practice to rely for evidence on anecdotes of 'survivors' [sic]. This guarantees unrepresentative data, leading to a complete absence of robust comparative analysis of harms by gender, age, etc. The notion of "gender-based harm" to say the least is ill-defined. OFCOM simply does not know what it is talking about, so this is bound to result in sex discrimination.</p> <p>'Good practice' here is likely to be inimical to freedom of expression and fairness, encouraging automated moderation, pro-active take-downs, and design-level content filtration, without safeguards for due process for accused users, or protection of controversial or minority opinions. This is bound to result in disproportionate censorship or discrimination against users whose content is mischaracterised, especially men raising dissenting views on gender, abuse, or public policy. So there needs to be gender-neutrality in keyword filters, moderation logs,</p>

Question	Your response
	<p>community governance: a safety design such as has been adopted by Reddit and Discord, protecting all users without gendered presumptions. As for support specifically for male victims, the <i>Men's Advice Line</i> would advise on how services can engage with under-reported abuse among men & boys. This should be part of a far more balanced stakeholder consultation, not relying on bodies concerned only with females.</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? – N</p> <p>OFCOM will only confirm it's unfit for purpose in overseeing provider adherence to draft guidance by being the publisher of assessments of how providers address the safety of women and girls, without correspondingly re men & boys. This is over-regulation, that could see providers penalised for adhering to the law in promoting genuine equality, and forced to adopt narrow actually exclusive rather than inclusive measures. OFCOM is in no position to ensure evidence-based, balanced and transparent assessment.</p> <p>The obvious danger is that platforms prioritising genuine equality are penalised, suffering unwarranted reputational damage. There surely has to be a proper, broad view of harm than a gender-exclusive focus: promoting gender-neutral safety design. Otherwise, providers are pressured into moving away from effective and fair frameworks instead to adopt narrow gender frameworks, merely to avoid negative public reporting by OFCOM.</p> <p>As a public body OFCOM needs to ensure that in encouraging compliance it does not indirectly discriminate, or perversely incentivise providers to overlook at-risk groups just because they aren't female.</p> <p>When it comes to publishing assessments, OFCOM needs to make sure evaluation criteria are evidence-based and balanced; that providers are judged on how well they reduce harm for all users, not merely on how they align with gender-specific language and narratives. And rather than a one-size-fits-all standard being imposed there should be leeway for platforms to reflect the different risks according to the type of platform and the different audiences they serve. Indeed, why not incentivise innovation and inclusivity by highlighting and rewarding platforms that</p>

Question	Your response
	<p>develop inclusive, user-led safety tools that work across gender, age, and risk types?</p> <p>The likelihood is that OFCOM's public assessments undermine its own credibility and that of the Online Safety regime in general, and exposes itself to indirect discrimination actions.</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? – N</p> <p>The Equality Impact Assessment (EIA) obviously is hideously deficient, failing to address harms, not least gender-based harms, suffered by men & boys. OFCOM has failed to justify a claim of disproportionate impact on women and girls. Available data suggests otherwise, and OFCOM offers no transparent methodology for establishing this claim. The whole consultation process is skewed, non-inclusive, and relies almost exclusively on ideologically-driven stakeholders and dismissing or ignoring counter-evidence of actually greater harms to men & boys. This puts OFCOM in flagrant breach of Public Sector Equality Duty (PSED), and flouts the procedural fairness required by the Equality Act 2010 in respect of the protected characteristic of sex, and inevitably leads to wholesale serious sex discrimination that in turn leads to insisting that service providers do likewise. OFCOM clearly is overstepping Proportionality and Rights Protections, and will infringe freedom of expression (under Article 10 of the Human Rights Act), freedom from discrimination (under Article 14), and the UK's general constitutional principles of proportionality and non-censorship. OFCOM has simply declined to recognise even the possibility that online content even may be gender-neutral, never mind more harmful to men & boys.</p> <p>Conclusion</p> <p>OFCOM is setting itself up to face and lose legal actions for the most serious and harmful sex discrimination against males, destroying what little public confidence remains in OFCOM as to impartiality and the very basis of legitimacy of a regulatory framework. It is imperative that OFCOM abandons a sex(gender)-based approach, instead to be all-inclusive, capturing the whole gamut of on-line abuse.</p> <p>OFCOM has long been captured by the most extreme ideology of Critical Social Justice Theory 'identity politics', the origin, development and current manifestation of which shows it to be extremely malicious. [it is Marxian backlash against the masses;</p>

Question	Your response
	<p>specifically 'the workers' of old, first seen to be simply male, latterly also 'white' and heterosexual. Individually and en mass, people with these facets have been falsely deemed 'oppressive'.] Adoption of this quasi-religious nonsense amounts to the most serious misconduct in public office.</p> <p>The equality and rights assessments require urgent revision: commissioning a balanced, transparent, empirical EIA to assess harms to <i>both</i> sexes, engaging with a far broader, genuinely diverse range of stakeholders, including those representing men & boys, and re-framing language to ensure it captures the full spectrum of online abuse, rather than embedding a malicious gender bias into regulation.</p> <p>To reiterate: OFCOM is setting itself up to face and lose legal actions for the most serious and harmful sex discrimination against males, destroying what little public confidence remains in OFCOM as to impartiality and the very basis of legitimacy of a regulatory framework. It is imperative that OFCOM abandons a sex(gender)-based approach, instead to be all-inclusive, capturing the whole gamut of on-line abuse.</p>
<p>Question 6: Do you agree that our draft Guidance is likely to have positive effects on opportunities to use Welsh and treating Welsh no less favourably than English? If you disagree, please explain why, including how you consider the draft Guidance could be revised to have positive effects or more positive effects, or no adverse effects or fewer adverse effects on opportunities to use Welsh and treating Welsh no less favourably than English.</p>	<p>Confidential? – N</p> <p>No comment</p>

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