



Consultation response form

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>The NSPCC is the UK's leading child protection charity with over 130 years in experience safeguarding children from harms. A driving force in the passage of the Online Safety Act, we are committed to ensuring every child is safe online.</p> <p>We have significant knowledge and expertise, based on a strong research and evidence base and direct work with children, and are committed to using this to advocate for the development of a strong, ambitious, regulatory framework which centres children's experiences and tackles the full range of harms children experience online.</p> <p>Since 2006, the NSPCC has hosted Childline, a service that gives children and young people access to confidential support when they need it and ensures they have someone to turn to when they are in distress or danger. In 2024-25, Childline delivered 3,327 counselling sessions about online-related issues, including online sexual exploitation and abuse, online bullying and online safety. As well as providing vital support to children, these contacts give the NSPCC unique insight into the current risks and harm faced by children online. Extracts from previous and new contacts to Childline are used throughout this consultation response to highlight these important lived experiences.</p> <p><u>Categorisation of harm: the exclusion of child sexual exploitation and abuse</u></p> <p>We understand Ofcom's decision to highlight thematic areas to focus on in the Guidance. This provides a focus and helps ensure that many of the most significant risks</p>

Question	Your response
	<p>to women and girls can be addressed. However, we disagree with the selection of these harm areas.</p> <p>It is the Government's explicit intention that the online gender-based harms guidance (hereafter the Guidance) "summarises in one clear place the measures that can be taken to tackle the abuse that women and girls disproportionately face online".¹ While the Guidance summarises a large number of these measures, it also makes the active decision to exclude information on key harm areas such as child sexual exploitation and abuse (CSEA) and eating disorder content, stating that this information is sufficiently addressed elsewhere in Codes of Practice. We believe this logic is flawed, runs contrary to Parliament's intention for the Guidance, and risks embedding an approach that systematically under-explores the experiences of girls.</p> <p>In particular, we are deeply concerned about the impact of the decision to exclude CSEA as a category.</p> <p>Evidence demonstrates that online CSEA is highly gendered, with 4 out of 5 victims of child online grooming being a girl.² Similarly, girls are disproportionately represented in both 'self-generated' and AI child sexual abuse material (CSAM) with 94%³ and 99%⁴ of these images depicting girls.</p> <p>While not enforceable, the strength of the Guidance lies in its ability to be more ambitious than Codes, supporting companies who wish to take actions that exceed their minimum legal duties. Consequently, to exclude CSEA on the basis that it is a priority offence, addressed by Ofcom's Codes, runs contrary to the logic of the Guidance and its distinct role: to support action that goes beyond the Codes to deliver best practice for women and girls. For example, the Guidance currently does not address the important best practice measure to use proactive detection tools to identify unknown child sexual abuse media (CSAM) (as well as hash matching existing content), which is not currently recommended in the Illegal Harms Codes. Choosing to exclude CSEA as a category, the Guidance overlooks these important measures that extend beyond the actions detailed in Codes.</p>

¹ DSIT (2025) [Online Safety Act: explainer](#). GOV.UK

² NSPCC (2024) [Online grooming crimes against children increase by 89% in six years](#)

³ IWF (2025) [Annual data insight report 2024](#)

⁴ IWF (2024) [What has changed in the AI CSAM landscape?](#)

Question	Your response
	<p>CSEA is not a form of gender-based harm that can be adequately covered by the other four harm categories. Ofcom have excluded girls from their analysis of different forms of image based sexual abuse, such as cyber-flashing. This is likely done on the basis that this abuse, when directed at girls, is CSEA. However, as CSEA is not covered in the guidance, it means girls' experience of this harm are wholly overlooked, which is an important oversight given that one survey found approximately a third of girls had received an unwanted picture of male genitals.⁵ Moreover, the online sexual targeting of girls can involve distinct age-related factors which must be given specific consideration by services.</p> <p>For example, online perpetrators of CSEA often create fake profiles registered with an age and interests selected to build trust with potential victims.⁶ NSPCC research on the targeting of girls online⁷ demonstrates the large role fake profiles and the visibility of personal information play in enabling gender-based harm. The Guidance should explore the value of measures which limit the use of fake profiles for malicious purposes, but this is currently overlooked due to the exclusion of CSEA as a harm type.</p> <div data-bbox="703 1167 1385 1570" style="border: 1px solid black; padding: 10px; background-color: #e0f2f1;"> <p><i>"I met a guy online who told me he was 15. We started having a relationship and I shared some inappropriate photos and messages with him. I've found out from the police that he isn't actually 15. I've been experiencing panic attacks and flashbacks. My parents yelled at me a lot when they found out and I cried on the floor. I'm hoping I can talk to someone at school about it all."</i></p> <p>- Girl, 14, Childline⁸</p> </div> <p>Similarly, there are factors that can make it particularly challenging for girls to report sexual abuse and exploitation. A common experience described through Childline</p>

⁵ Ringrose, J., Regehr, K., and Milne, B. (2021) [Understanding and Combatting Youth Experiences of Image-Based Sexual Harassment and Abuse](#).

⁶ Reneses, M; Riberas-Gutiérrez, M; Guerra, N. (2024). ["He flattered me". A comprehensive look into online grooming risk factors: Merging voices of victims, offenders and experts through in-depth interviews](#). *Cyberpsychology Journal of Psychological Research on Cyberspace*. 18(4)

⁷ NSPCC (2025) [Targeting Girls Online How online services enable the abuse and harassment of girls](#). [Please find the full, unredacted and confidential version of this report attached to the consultation response]

⁸ Please note Childline snapshots are based on real Childline service users but are not necessarily direct quotations. All potentially identifying details have been changed to protect the identity of the child involved. This applies to all snapshots in this response.

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	<p>is that a girl believes, or is led to believe, that they will be prosecuted for making CSAM if they report the non-consensual sharing of self-generated imagery.</p> <div data-bbox="703 398 1385 882" style="border: 1px solid black; padding: 10px; background-color: #e0f2f1;"> <p><i>“Yesterday my ex contacted me online and told me that if I didn’t send him more nudes and videos, he would leak the pictures he already had. He also said if I tried to tell anyone he would report me for sending child porn to a minor - even though he was the one who insisted on them. I’ve been doing a lot of re-search and apparently, it’s illegal to take pictures of myself in that way and send them to someone else. Like, is that true? I honestly don’t know what to think or how to handle this.”</i></p> <p>- Girl, 16, Childline</p> </div> <p>Girls require specific age-sensitive information and support when reporting online harm. NSPCC research also recommends exploring whether specific functions should be introduced to make reporting harm easier for girls, yet such recommendations are currently overlooked.⁹</p> <p>The categorisation of gender-based harms holds significant power to shift the tone and emphasis of the Guidance’s analysis. For example, including pile-ons and harassment as a category of harm effectively draws attention to the specific risks faced by women and girls who are public figures; the current exclusion of CSEA as a category of harm is having the opposite, inhibiting effect on the exploration of best practice for girls.</p> <p><i>To address this, the NSPCC strongly recommends that Ofcom revises the current categorisation of gender-based harms to include CSEA as a crucial fifth harm type in the Guidance.</i></p> <p><u>An intersectional approach: the intersection of age and gender</u></p> <p>A strength of the draft Guidance is its recognition of the intersectional nature of gender-based harms online. Evidence repeatedly demonstrates that girls from marginalised communities disproportionately experience online harms:¹⁰ it is right for these experiences to be fore-</p>

⁹ NSPCC (2025) [Targeting Girls Online How online services enable the abuse and harassment of girls](#): solution 5.3.5

¹⁰ Girlguiding (2024) [Girls’ Attitudes Survey 2024](#)

Question	Your response
	<p>fronted. In the rest of this section, we outline examples of where this intersectional approach could be strengthened.</p> <p>While the Guidance mentions the intersection of gender and age, as seen in case study 8, age must not be treated as an example to draw on, but an important lens through which to interrogate all online gender-based harms. Without this lens, an age-blind analysis is offered which often overlooks the age-specific experiences of girls. Given Ofcom’s choice to exclude a section in the Children’s Codes on girls’ experiences of online misogyny, and instead refer readers to this Guidance,¹¹ it is even more concerning that the current approach fails to sufficiently address children’s experiences of gender-based harms.</p> <p>To demonstrate the need for a more age sensitive analysis, it is instructive to explore how applying the lens of age to two online experiences, (1) reporting online harm and (2) experiencing technology-facilitated (TF) domestic abuse, reveals that several important protective measures for girls are currently missing from the Guidance.</p> <p>1. Considering girls’ reporting of abuse, it is valuable to note that child-on-child abuse is estimated to account for a third of child sexual abuse,¹² with evidence highlighting that children are often more reticent to report harm when it comes from another child.¹³ Research by Thorn identified that one of the most common reasons children provide for not using online reporting of harm is that they are worried about remaining anonymous.¹⁴ Developmental research also suggests that early adolescence is a period where sensitivity to on and offline peer rejection is particularly acute and can help to explain this increased reluctance to report other children;¹⁵ peer-pressure and a fear of social repercussions can act as serious deterrents against utilising reporting or blocking functions.</p>

¹¹ Ofcom (2025) [Protecting children from harms online Volume 2: The causes and impacts of online harms to children](#) Pg3

¹² NSPCC (2024) [Statistics briefing: harmful sexual behaviour](#)

¹³ An NSPCC survey of children and young adults found that children were less likely to tell anyone about harmful sexual behaviour by other children than about abuse committed by adults: five out of six respondents abused by another child had not told anyone about it prior to responding to the survey. Radford et al (2011); Office for National Statistics (2024).

¹⁴ Thorn (2021) [Responding to Online Threats: Minors’ Perspectives on Disclosing, Reporting, and Blocking](#).

¹⁵ Orben, A, Meier, A, Dalgleish, T et al. (2024) [Mechanisms linking social media use to adolescent mental health vulnerability](#). *Nat Rev Psychol* 3, 407–423

Question	Your response
	<div data-bbox="703 264 1385 613" style="border: 1px solid black; padding: 5px; margin-bottom: 10px;"> <p><i>“Thank you for talking to me earlier about what I can do about this revenge porn situation. Staying anonymous really is the most important thing to me, I don’t need more people, and definitely not my parents, finding out about this. The Victim Support website was really reassuring about confidentiality, and I am going to use Report Remove to get my pictures taken down”</i></p> <p>- Girl, 16, Childline</p> </div> <p>Examining the reporting process with an age-specific focus enables the identification of helpful additional measures that should be included in the Guidance, such as the <i>need for services to develop child-friendly explanations of reporting which address common concerns among girls, such as those about reporter anonymity.</i></p> <p>2. As well as challenging services to consider girls’ experiences, the Guidance has an important role to play in challenging common misconceptions about these experiences – including that domestic abuse only impacts girls indirectly.¹⁶ Ofcom risks perpetuating this misconception when, in the Guidance, it refers only to the impact of domestic abuse on women, not girls.¹⁷ TF-abuse within intimate relationships can and does happen to girls, as the NSPCC hears through contacts to Childline.</p> <div data-bbox="703 1267 1385 1518" style="border: 1px solid black; padding: 5px; margin-bottom: 10px;"> <p><i>“In the last 6 months, my boyfriend has completely changed. If I don’t answer my phone straight away, he’ll send me like 50 messages and call non-stop. The messages get angrier and angrier calling me ugly and worthless. I don’t know if it’s me that is the problem, I just need someone to talk to.”</i></p> <p>-Girl, 16, Childline</p> </div> <p>This harm is legally categorised as domestic abuse when it targets those aged 16 and over,¹⁸ and younger girls can also be victims of teenage relationship abuse. Research suggests that while 70% of children and young people</p>

¹⁶Domestic Abuse Commissioner (2025) [Victims in their own right? Babies, children and young people’s experience of domestic abuse](#)

¹⁷ Ofcom (2025) [Consultation Document A safer life online for women and girls](#) Pg 15 on online domestic abuse reads: “This can be traumatic for survivors and victims, with women feeling physically unsafe because the perpetrator knows their location”, no references to girls are made in this section.

¹⁸ GOV.UK (2021) [Domestic Abuse Act 2021](#)

Question	Your response
	<p>say they would seek support if they experienced domestic abuse, over 6 in 10 of these were unsure of where they could access support.¹⁹</p> <p>Online services have a significant role to play in helping users experiencing harm online to access support services. <i>The Guidance should make it clear that girls experience TF-domestic abuse and teenage relationship abuse so that platforms develop age-appropriate signposting to support services.</i> An embedded focus on the intersection of gender and age is necessary to ensure that age-specific experiences are not obscured, and services appreciate the specific steps needed to protect girls online.</p> <p><u>Further intersections to embed: gender identity</u></p> <p>Another cohort whose experiences are currently used as an example, rather than embedded across the analysis, is trans women and girls. The Guidance makes helpful references to misgendering and the disproportionate harassment that trans women and girls face online: this is true and important to highlight. A survey of trans girls and gender diverse children found that almost half (48%) had experienced cyber bullying, 66% of which was directly due to their gender identity.²⁰</p> <div style="border: 1px solid black; padding: 10px; margin-top: 10px;"> <p><i>“A couple of years ago, a group of people from school made a fake Instagram account pretending to be me. They basically outed me for being trans and other people would post nasty transphobic comments, saying I was a “freak” and stuff. This fake account went inactive for a while, but recently it came back and the people behind it have started posting multiple things a day. They’ve even stolen photos from my parents’ Facebook to post on the account. I’ve tried reporting the account since it started and so have many of my friends – but Instagram hasn’t done anything about it and I don’t know what to do anymore. I just feel so awful, I’ve been physically shaking from the stress of it all.”</i></p> <p>-Girl, 13, Childline</p> </div>

¹⁹ Women’s Aid (2023) [Influencers and Attitudes: How will the next generation understand domestic abuse?](#)

²⁰ Herrmann, L; Bindt, C; Hohmann, S; Becker-Hebly, I. (2023). [Social media use and experiences among transgender and gender diverse adolescents](#). Int J Transgend Health; 25(1):36-49.

Question	Your response
	<p>While these examples should be kept, they do not offer sufficient insight into the possible experiences of trans women and girls online. Just as age specific concerns must be embedded throughout the guidance, there is also a need for <i>trans girls' experiences to be brought inside the framework,</i>²¹<i>allowing new issues and solutions to emerge.</i> These include the need for ongoing customisation of profile details to reflect changes in gender and name, the ability to remove past posts and to select avatars that affirm gender identity.²²</p> <p><u>Engagement with independent experts and those with lived experience</u></p> <p>We welcome Ofcom's approach to stakeholder engagement during the development phase of the Guidance. This ensured subject-matter expertise was better able to inform definitions and the approach adopted, such as the addition of intimate image abuse as a fourth category of gender-based harm. This demonstrates the clear value of earlier engagement with independent experts and civil society. <i>The NSPCC recommends that this approach is adopted in future work, while also highlighting the need for dedicated engagement with those with lived experience and children and young people during the drafting of Guidance and reporting on the Guidance's impact.</i></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>Online gender-based harm reduction strategies have typically had a heavy emphasis on educating women and girls about risks, placing an onus upon potential victims to educate themselves and alter their behaviour. We therefore welcome Ofcom's effort to also highlight the important role of educating men and boys and introducing frictions to disrupt harm pathways, such as that demonstrated in case study 13. This is reinforced by the</p>

²¹ The current definition of intersectionality on page 9 of the draft Guidance positions gender identity as an axis of oppression intersecting with gender-based harms. Gender identity is, by definition, always at the centre of gender-based harms; as such, it should not be considered an intersection of gender-based harm, as currently defined, but a lens through which to interrogate all online gendered harms.

²² McKenna, J; Wang, Y; Williams, C; McGregor, K and Boskey, E. (2022) ["You can't be deadnamed in a video game": Transgender and gender diverse adolescents' use of video game avatar creation for gender-affirmation and exploration.](#) *Journal of LGBT Youth*, 21(1), 29–49.

Question	Your response
	<p>choice to forefront the role of prevention and a safety-by-design approach, which is sign-posted in actions 4-6.</p> <p>Women and girls do not just experience harm from the content and contact which impacts them personally and directly. Their lives are also affected by the content and experiences that their peers have, as these can play a role in shaping the views and treatment of women and girls both on and offline. The Guidance rightly recognises this in places, particularly in action 6, where the harm arising from the violent, misogynistic content presented to men and boys is made apparent.</p> <div data-bbox="699 730 1385 1055" style="border: 1px solid black; padding: 5px;"> <p><i>“By now, you have probably heard about Andrew Tate. All the boys in my class talk about him and they are so influenced by him. They started picking on me and some of my friends because we are girls wanting to become things that ‘aren’t for women’. It’s made me feel like I’ll never get into my chosen field, considering people like them will be in the future generation. I hate it so much, but I know I can’t do anything to stop it.”</i></p> <p>- Girl, 13, Childline</p> </div> <p>The impact of ‘indirect’ harms on girls should be drawn out further throughout the analysis, which tends toward focussing on the most extreme content to the detriment of exploring the role of the ubiquity of ‘less severe’ content. This can be seen by the choice to focus on influencers while overlooking the role of less followed but nonetheless damaging online actors, like members of incel communities and malicious fake ‘bot’ accounts. This is why <i>we encourage Ofcom to build on their existing analysis and increase the emphasis placed on the complexity of gender-based harms: indirect routes for harm, the role of ubiquity, and the need to include all genders in tackling its impacts.</i></p> <p><u>Drawing out interconnections</u></p> <p>Whilst the NSPCC is encouraged by the selection of the nine actions, and their focus on a preventative approach, <i>the delineation of the nine areas should not obscure useful interconnections.</i> For example, NSPCC research on the targeting of girls online²³ highlights that while users are typically given the choice to accept or deny connections, some platforms allow unconnected users to</p>

²³ NSPCC (2025) [Targeting Girls Online How online services enable the abuse and harassment of girls](#)

Question	Your response
	<p>send friend requests accompanied by a misogynistic or hateful message that will be shown in full when the user is presented with the connection request. The ability to block this connection is important, but harm can still occur if connection requests enable users to share and view misogynistic content. Targeting such issues requires that services are encouraged to look across action areas at user controls (action 7), safety settings (action 5), and blocking harmful content (action 6) to consider how they interact.</p> <p>Similarly, greater transparency (action 3) and sharing of appropriately redacted results from the abusability evaluations and product testing (action 4) conducted by platforms would provide a range of benefits such as supporting shared learning and reducing duplicate of research.</p> <p><u>A possible tenth action: generating and sharing information across actors</u></p> <p>The approach to harm reduction established by the nine action areas is currently markedly insular, focussing on the actions one service can take to address known harms on its platform. This is exemplified in action 9 on taking appropriate action, which highlights the steps a service can take internally. This overlooks the key role that collaboration across platforms must play in efforts to reduce online harms. During the passage of the Online Safety Act, the Government made explicitly clear that services must collaborate reasonably to address illegal harms which span multiple platforms.²⁴</p> <p>Online grooming is a useful example that highlights the importance of emphasising the need for cross-platform collaboration, as a common tactic used is the deliberate moving of a child from a relatively public environment to a riskier forum, such as an end-to-end encrypted private messaging space.²⁵ In scenarios such as these, it is vital that services share information across platforms to detect and disrupt such activity.</p> <div data-bbox="699 1760 1385 1919" style="border: 1px solid black; padding: 5px;"> <p><i>"I work in a primary school and would like to discuss online safety. A mother in the school has spoken to me with concerns for her 10 year old daughter, Amy, who has been contacted on Roblox by a person asking for</i></p> </div>

²⁴ [House of Commons Official Report – Public Bill Committee – Online Safety Bill](#) (2022).

²⁵ Office for National Statistics (2021) [Children’s online behaviour in England and Wales: year ending March 2020](#)

Question	Your response
	<p data-bbox="715 271 1374 577"><i>her phone number. Amy has given her number and the person has sent her sexually explicit messages, including photos. The mother has confiscated her child's phone. Amy will not talk to her mum about what has happened. The school have given regular internet safety messages, assemblies and lessons. Amy is upset and angry. The mother is worried and upset. I'd like advice to pass on."</i></p> <p data-bbox="715 600 1078 633">-Professional, NSPCC Helpline</p> <p data-bbox="699 712 1382 1137">A good practice case study to draw on could include Lantern, a cross-platform signalling programme which focuses on identifying online CSEA which last year led to the removal of over 7,000 pieces of CSAM and enforcement action against 102,082 accounts.²⁶ Platforms should be encouraged to engage in signal sharing schemes such as Lantern, and to develop new and improved ways of sharing suspicious forms of activity that are currently overlooked, like patterns of sharing gift cards²⁷ an issue which will be further explored later in our analysis.</p> <p data-bbox="699 1160 1382 1865">As well as sharing information, the Guidance should also encourage services to invest in and share research that supports the identification of emerging risks and best practice. The risks women and girls face online evolve quickly, and so too can their mitigations; it is important that services share insight so that the evidence base and dissemination of this evidence keeps pace. While we recognise that services will not share proprietary information, this reticence for collaboration appears to extend to basic safety features which offer little competitive advantage. For example, we understand that services are often reluctant to share keyword lists that detail the coded language used by malicious actors to avoid detection. Sharing research and data like keyword lists should be highlighted as a powerful mechanism to pool information and support the identification of emerging trends, offering better protections for women and girls across platforms.</p>

²⁶ Tech Coalition (2024) [Lantern Transparency Report 2024](#)

²⁷ NSPCC (2025) [Targeting Girls Online How online services enable the abuse and harassment of girls](#)

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	<p>Furthermore, the Guidance should highlight that as well as improving information sharing between platforms, services must also interrogate their own supply chains.²⁸ A service such as a social media site is often part of a much larger supply chain of businesses, reliant on these external actors to perform important functions like content moderation. As shown in the case of AI tool ‘Stable Diffusion’,²⁹ introducing compromised and dangerous practices at one stage of a supply chain, such as data sets that include CSAM, can result in dangerous outputs on services further downstream. While many of the companies commissioned by user-to-user and search services are out of scope of the Online Safety Act, <i>what lies firmly within the scope of the Guidance is the recommendation for platforms to review the potential generated risks that may be introduced through their supply chains and take appropriate action to mitigate harm.</i></p> <p>While a need for collaboration across actors may be drawn out as a theme within existing actions, <i>the NSPCC recommends considering whether the delineation of this area as a tenth category of action on ‘information sharing and collaboration’ would be more effective.</i> A separate action would provide space to explore where collaboration plays a role in both foundational and good practice steps, as well as providing space to explore important nuances like the need to act across supply chains, between platforms, as well as with offline safeguarding partners including law enforcement and support services. Adding another action would offer an opportunity to draw out the complexity of the range of actors that services should collaborate with, and in what ways, to support delivering change for women and girls.</p> <p><u>Clarifying the naming of action 7</u></p> <p>In Figure 1, the aim of action 7 is describe to be to “give users <u>better control</u> over their experiences”.³⁰ Similar language is used throughout action 7, where phrases such as “[p]roviders can empower users by providing them with <u>greater and more granular control</u> over their own experiences”³¹ reinforce the impression that</p>

²⁸ EAW (2022) [Violence Against Women and Girls \(VAWG\) Code of Practice](#)

²⁹ Thiel, D (2023) [Investigation Finds AI Image Generation Models Trained on Child Abuse](#). Stanford Cyber Policy

³⁰ Ofcom (2025) [Consultation Document A safer life online for women and girls](#) Pg 8

³¹ Ofcom (2025) [Consultation Document A safer life online for women and girls](#) Pg 48

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	<p>'greater' levels of user-control are always preferential. While this may be an appropriate aim for women, an age-sensitive approach highlights that greater control over experiences may not be in the best interests of delivering safe, age-appropriate experiences for young girls. <i>We recommend that the language used is altered to reflect this and the action is renamed 'give users <u>appropriate control over their experiences</u>'.</i></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>In examining the recommendations and examples detailed in the Guidance, we firstly draw out a number of overarching themes for consideration, before turning to action specific feedback on the case studies and good practice identified.</p> <p>From the NSPCC's analysis of the draft Guidance, the most pressing of these themes is the Guidance's insufficient age-differentiation of case studies and best practice recommendations. This undermines the effectiveness and applicability of the good practice steps, as recommendations do not always appropriately account for the needs of girls. The NSPCC also recommends alterations to ensure that the Guidance sufficiently addresses gendered risks on gaming platforms.</p> <p><u>Overarching approach to good practice and case studies</u></p> <p><u>Age sensitive analysis of best practice</u></p> <p>The NSPCC is pleased to see examples in the Guidance where the distinct needs and experiences of girls online are recognised. This is evident in case study 13, which highlights the need for deterrence messaging to avoid shaming children and instead act as a supportive, educational tool. However, many <i>actions within the Guidance need to go substantially further to meaningfully account for how measures should be adapted for girls.</i></p> <p>For example, the good practice under action 5 focuses on the role of customisation of defaults. As the Guidance itself acknowledges, customising defaults away from the safest settings is not an appropriate goal for young children. By focussing on customisation, the Guidance fails to explore what would constitute good practice for girls.</p>

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	<p data-bbox="711 271 1374 517"><i>“I had parental controls on all my devices, but I figured out how to turn them off. It cut me off from my friends when the controls were on, I missed them, plus the funny Tik Toks help when I’m feeling rubbish. It has meant I’ve had guys I don’t know sexting me, though. I can’t tell my parents because I’m not meant to have WhatsApp and Snapchat anymore.”</i></p> <p data-bbox="711 521 935 555">-Girl, 13, Childline</p> <p data-bbox="695 560 1382 904">This issue is highlighted in case study 8, which reiterates the need for the safest defaults for child users: something that is already required in the foundational steps. As such, it <i>would be more valuable to explore how services could go further to design safety settings that offer girls greater protection.</i> Examples that the Guidance could draw on include Meta’s teen accounts, which look to prevent children under 16 altering their default safest settings without parental permission.^{32, 33}</p> <p data-bbox="695 981 1382 1406"><i>Similarly, in action 7 on user choice, there should be an exploration of whether all features offered by services are age-appropriate for child users.</i> NSPCC research identifies 19 features that support the identification and targeting of girls online.³⁴ While removing all these features may be impractical, services must be encouraged to consider which functionalities should be modified or removed for younger age ranges. For example, live streaming is known to place girls at increased risk of harm³⁵ and it is questionable whether the youngest child users need access to this feature.</p> <p data-bbox="695 1433 1382 1798">In action 2, we are pleased to see case study 4’s acknowledgment of the importance of identifying younger users while risk assessing services. However, this case study only raises the importance of identifying if young girls are present on the site and adding age-related risks and mitigations in their risk assessments. This fails to explain how services may determine what age-appropriate risks and mitigations are, and how they can be delivered. It will be valuable for the Guidance to offer services advice regarding how they can deliver age-appropriate, tar-</p>

³² Instagram (2024) [Introducing Instagram Teen Accounts: Built-In Protections for Teens, Peace of Mind for Parents](#)

³³ Although there are concerns regarding the quality of age assurance used to enforce these teen accounts, see: 5Rights (2025) [Case Study – Is Instagram now safe for teens?](#)

³⁴ NSPCC (2025) [Targeting Girls Online: How online services enable the abuse and harassment of girls](#)

³⁵ NSPCC (2025) [Targeting Girls Online: How online services enable the abuse and harassment of girls](#)

Question	Your response
	<p>geted mitigations. Fundamental to this will be the recommendation to use highly effective age assurance to enable services to safely identify the age of children as only once services are aware of the age of child users can they reliably deliver the age-based protections identified in their risk assessments.</p> <p>Also in action 2, the NSPCC welcomes the Guidance’s reference to the need for services to work in a trauma-informed way with people with lived experience of gender-based harms. Too often, research with children is considered ethically complex and too expensive to invest in, resulting in products and services that overlook children’s needs, vulnerabilities and experiences.³⁶ If user engagement is used to inform risk assessments, it is important that children are included in this work. The Guidance should explicitly acknowledge the need for services to include girls in their lived-experience engagement work and the need to consider how this can be done in a safe, age-appropriate, and meaningful way.³⁷</p> <p>This omission of age-specific adjustments to good practice is sometimes mirrored in the Guidance’s language across action areas. For example, when considering patterns of harassment, case study 2 frames both the experience and service response as only needing to address women, not girls. The Guidance states that “[w]omen, particularly women from ethnic minority backgrounds, can be sexualised and fetishised online in ways which harm their sexual autonomy.”³⁸ Similarly in case study 15, the Guidance reads that “[d]igital misogyny refers to online hate and dehumanising language experienced by Black women online.” These are both valuable acknowledgments of the interaction of sexism and racism online, yet the language used excludes the experiences of girls of colour. The NSPCC recommends that Ofcom review the use of language throughout the Guidance to ensure that girls are not artificially excluded from important recommendations.</p> <p><u>Online gaming: risks and good practice</u></p> <p>Another area that is currently overlooked in the Guidance, concerns the risks and necessary mitigations for</p>

³⁶ Ellis, K., Hickle, K., and Warrington, C. (2023). [Researching Sensitive Topics With Children and Young People: Ethical Practice and Blurry Boundaries](#). *International Journal of Qualitative Methods*, 22

³⁷ NSPCC (2023) [Research with children: ethics, safety and promoting inclusion](#)

³⁸ Ofcom (2025) [A Safer Life Online for Women and Girls Practical Guidance for Tech Companies](#). Pg21

Question	Your response
	<p>women and girls using online gaming services. Over half of women in the UK say they game³⁹ and international research suggests that over three quarters of female gamers experience gender-based harms while gaming.⁴⁰ Currently the Guidance’s exploration of gaming is limited to a brief mention of the need for moderating voice messaging in online gaming platforms and the ability to report harassment and assault in virtual reality (VR) environments. It would be useful for the Guidance’s analysis in action 7 to also highlight preventative technologies, like Meta’s Horizon Worlds ‘personal boundary’ function⁴¹ which offers users choices concerning the level of protection they would like from ‘physical contact’ in VR settings. Moreover, many other specific harms women and girls face in online gaming environments should be addressed by the Guidance.</p> <div data-bbox="703 837 1347 1335" style="border: 1px solid black; padding: 10px; background-color: #e6f2e6;"> <p><i>“Recently I met a guy on my VR game and I’m confused about how I should feel about him. He’s really bad, like he always makes sexual comments towards me and asks me to ‘kiss’ him in the game. I know that’s messed up but I love his voice and he makes me feel like the person I’d rather be. Nobody gives me that kind of affection in the real world. I guess that’s why I use VR, so I can look and be like someone I’m not and it makes me feel good about myself. I think I like this guy but I don’t know if he just likes the character I play as online.”</i></p> <p>- Gender not specified, 16, Childline</p> </div> <p>One such harm, that should be explored in action 6, is that gaming often introduces characters and storylines where harmful gendered ideas and stereotypes can be portrayed, reinforced and normalised. On the extreme end, some games explicitly encourage misogynistic beliefs in players. This was demonstrated by the game ‘No Mercy’ hosted on online gaming platform Steam until public campaigns led to its removal in the UK.⁴² The aim of this game was described as to virtually rape and assault as many women as possible and used violent misogynistic taglines like: “Never take ‘no’ for an answer.” By</p>

³⁹ Baker, N (2024) [Online gaming statistics 2024](#). USwitch

⁴⁰ Reach3 (2021) [Women in Gaming | Reach3 Insights Mobile Deliverables](#)

⁴¹ Sharma, V. (2022) [Introducing a Personal Boundary for Horizon Worlds and Venues](#). Meta

⁴² Murray, A (2025) [Horrifying rape video game which encourages players to sexually assault women banned from Steam](#). The Mirror

Question	Your response
	<p><i>overlooking gaming, the Guidance does not address important areas, like the need for these online services to have robust processes to identify and prevent the hosting of games on their platform which encourage extreme and dangerous misogynistic beliefs.</i></p> <div data-bbox="703 472 1347 792" style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p><i>“I like gaming in my spare time. The people I play online are nice but mostly boys – and some of them are sexist which really annoys me. Like, one game I played had voice chat and there were some guys talking about how the only women they like are the ones that stay in the kitchen and keep quiet. They were talking about sex stuff too, and that’s when I left cos it gave me the creeps”</i> -Girl, 16, Childline</p> </div> <p>Another key route for online gendered harm in online gaming environments relates to the use of in-game gifting and rewards. The ability for players to send other users gifts can be used to create a power imbalance and is often used tactically in online grooming,⁴³ a phenomenon which disproportionately impacts girls.⁴⁴ Chapter 7 of the NSPCC’s research into the online targeting of girls⁴⁵ highlights that gifting can be particularly dangerous as many platforms do not have systems in place to identify suspicious gifting patterns. The Guidance should address the key role that in-game gifting can play in facilitating grooming and add the good practice steps identified in the NSPCC report, which include preventing adult accounts from sending in-game gifts to child users and developing systems which support the flagging of gifting patterns as a key indicator of grooming.</p> <div data-bbox="703 1469 1369 1843" style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p><i>“Something happened which I’m kinda ashamed of, but somehow along the line I got caught up in sending certain pictures of myself to this dude. We met on this game I like – he seemed nice at first but then slowly he started asking for more information, then pics of myself. I know it sounds stupid, but I went along with it cos I liked the attention – it made me feel special. Sometimes the guy would buy me things in the game as a reward for sending him pics.”</i></p> </div>

⁴³ Kavenagh, M (2023) [Child Sexual Exploitation in Online Gaming. Risks and Realities.](#) UNICEF

⁴⁴ NSPCC (2024) [Online grooming crimes against children increase by 89% in six years](#)

⁴⁵ NSPCC (2025) [Targeting Girls Online: How online services enable the abuse and harassment of girls](#) Pg34

Question

Your response

I can't afford to buy any of that stuff myself, so it felt nice"

-Girl, 13, Childline

"I was playing Roblox and I was on a game where you work at a pizza place and two people were pressuring girls to do inappropriate stuff with them and if they did, they would get extra money in the game. One of people was using sexist language, and one of them had a racial slur as their username. I have screenshots of everything they said, I just don't know how to report it. What should I do?"

- Girl, 14, Childline

Action Specific Feedback

For the remainder of this question we: (1) summarise previous recommendations made in this and previous NSPCC consultation responses for relevant actions, and (2) provide full detail on new proposals.

Action 2 on risk assessments

- In case study 5, services should be encouraged to develop mechanisms to engage with children and their lived experience in an age-appropriate way.
- Services should be encouraged to include all internal data sources, such as results from abusability testing, in their risk assessments.
- Services should be encouraged to use highly effective age-assurance as a basis for delivering age-specific mitigations identified during risk assessments.

Action 3 on transparency

- Services should be encouraged to share data and research with other services and external safeguarding actors where appropriate.

Action 5 on safer defaults

Above we discussed in detail the need for a more age-sensitive and ambitious approach to the good practice

Question	Your response
	<p>and case studies provided on setting safer defaults. Alongside these changes, <i>the NSPCC suggests that the Guidance recommends safety settings which can be introduced after users have connected.</i> NSPCC research highlights that post the point of connection, many of the protections from other users offered to children are removed.⁴⁶ Ideas such as a ‘cooling off period’ should be explored, which limit functionalities such as video calls or sharing media, for a specified period after a new connection is made to offer users a period of enhanced protection.</p> <div data-bbox="703 714 1386 1111" style="border: 1px solid black; padding: 10px; background-color: #e6f2e6;"> <p><i>“I was using snapchat and a random person requested to chat. I accepted (stupidly) even though I know the dangers. He had a story so I clicked on it and it was a picture of his penis! I told him I didn’t want to see that and then I swore a lot at him because I said I was 13. I realise it was stupid and how careful I need to be but I guess I had too much faith. I just feel disgusted and honestly disappointed in myself for accepting him. The fact I didn’t even give consent makes me hate it even more.”</i></p> <p>-Girl, 13, Childline</p> </div> <p>Another area for consideration is the circumvention of safety defaults offered in many online games. NSPCC research⁴⁷ highlights that even when child users have the highest safety defaults on to prevent strangers from contacting them, on some online gaming sites strangers remain able to contact them via in-game chat functions. This is an important loophole that weakens the protection offered by safety defaults. <i>The Guidance should recommend that all services which host games and experiences on their site establish policies that mean all games and experiences hosted on a site must offer experiences compatible with the highest safety settings or not be made accessible to child users.</i> This would offer protection to both girls and women, as their safety settings and contact preferences would be upheld across platform interfaces.</p> <p>Other recommendations include:</p>

⁴⁶ NSPCC (2025) [Targeting Girls Online: How online services enable the abuse and harassment of girls](#)

⁴⁷ NSPCC (2025) [Targeting Girls Online: How online services enable the abuse and harassment of girls](#)

Question	Your response
	<ul style="list-style-type: none"> • For services which enable tagging, services should turn off visible tags for child accounts. This would mean that other users cannot view the accounts of users tagged in content shared by children.⁴⁸ • Platforms which have free text bios often contain personal information about a user, potentially including sensitive information such as their age and where they live, which can leave girls more vulnerable to grooming and doxxing. This information should not be visible to users that a child is not connected with, and services should be encouraged to offer security warnings to child users about the personal information they put in bios.⁴⁹ <p><u>Action 6 on the circulation of sensitive content</u></p> <p>While we are pleased that Ofcom plans to hold further consultation on hash matching later this year, this Guidance must still address the need for services to invest in the detection of un-hashed CSAM. While important, hash-matching is only effective for detecting 'known' CSAM. It is illogical for the Guidance to include hash matching for NCII but not new CSAM, despite both measures being absent from current Codes.</p> <p>Evidence repeatedly shows that CSAM is deeply gendered, with the child depicted being a girl in anywhere between 94%⁵⁰ and 99%⁵¹ of images. Therefore, <i>it is important that good practice highlights the need for companies to invest in the technology needed to detect first generation CSAM.</i> This practice is already observed by some companies such as Flickr who use Thorn's CSAM classifier 'Safer',⁵² to identify potential new CSAM: it is possible, practicable and a key step toward improving girl's safety online.</p>

⁴⁸ NSPCC (2024) [NSPCC response to Illegal Harms Consultation](#) Pg38

⁴⁹ NSPCC (2024) [NSPCC response to Illegal Harms Consultation](#) Pg38

⁵⁰ IWF (2025) [Annual data insight report 2024](#)

⁵¹ IWF (2024) [What has changed in the AI CSAM landscape?](#)

⁵² Thorn (2023) [How Thorn's classifiers use artificial intelligence to build a safer internet](#)

Question	Your response
	<p>Furthermore, livestreaming is a significant space in which harmful content like new CSAM can be created and circulated online,⁵³ that is markedly under-explored in the current Guidance. Much like CSAM circulated in other online environments, it is a deeply gendered issue, with research suggesting 96% of children depicted in CSAM on livestreaming are girls, and 98% of the content depicts children estimated to be aged 13 or younger.⁵⁴ Services should be aware of the dangerous and gendered harms that can occur via livestreaming, such as sharing live abuse, as this becomes increasingly accessible and can have devastating impacts for the girls targeted.⁵⁵</p> <div data-bbox="703 734 1366 1093" style="border: 1px solid black; padding: 5px;"> <p><i>“Back when I was about 13, I used to make, like, sex cam videos online for people to watch live. At the time, I never felt pressured, it was my choice to do it. Sometimes I didn’t want to stop, I was so caught up in the curiosity and pleasing men of it – and I liked the nice things they’d say to me. When I look back now (almost 5 years later), I’m so confused by it all; I forget how young I was and I wonder sometimes if people took advantage of that”</i> - Girl, 18, Childline</p> </div> <p><i>The Guidance should recommend that services invest in refining and implementing the use of automated technologies for the detection of CSAM and other gender-based harms in livestreaming environments.</i>⁵⁶ Moreover, given the harms that can be circulated via livestreaming content, <i>we recommend that the Guidance also asks services to consider turning the ability to livestream off for the youngest child users.</i>⁵⁷</p> <p><u>Action 7 on user empowerment</u></p> <p>When considering user empowerment, it is also necessary to consider women and girl’s control of their online data. A highly relevant piece of good practice that spans actions 7, 8 and 9, is that <i>users should be able to easily record and download information regarding the online</i></p>

⁵³ Christensen, L.S. and Woods, J (2024) [“It’s Like POOF and It’s Gone”: The Live-Streaming of Child Sexual Abuse](#). *Sexuality & Culture*. 28. 1-15.

⁵⁴ IWF (2018) [Trends in Online Child Sexual Exploitation: Examining the Distribution of Captures of Live-streamed Child Sexual Abuse](#)

⁵⁵ We Protect (2018) [Global Threat Assessment: Working together to end the sexual exploitation of children online](#)

⁵⁶ Açar, K (2017) [Webcam Child Prostitution: An Exploration of Current and Futuristic Methods of Detection](#). *International Journal of Cyber Criminology*. 11. 98-109

⁵⁷ NSPCC (2025) [Targeting Girls Online: How online services enable the abuse and harassment of girls](#)

Question	Your response
	<p>harms they have reported to a platform. Formal and accessible records detailing the reports made by a user, and the actions taken by a platform, can be a helpful resource that should be available to people if they choose to download or share this information with external actors like law enforcement.</p> <p>Another piece of good practice that would support user’s control over their data is to enable users to view their profile from multiple other user positions to see what information is visible to a connected user and a stranger.⁵⁸ This function is already offered by some services, and offers a more interactive, personalised way to educate users about how they can alter their visibility online.</p> <p>Other recommendations include:</p> <ul style="list-style-type: none"> • Acknowledging the tensions that can exist between user choice and the need for sufficient protection for children based on their age and vulnerability. This includes renaming the action to ‘give users <u>appropriate control</u> over their experiences’ and highlighting that increasing children’s choice to reduce online protections is not always appropriate. The Guidance should also explore whether all features offered by services are age-appropriate for child users. • Suggesting platforms offer all users anonymous public-facing avatars. NSPCC research highlights that highly gendered avatars can be used to identify and target girls online; offering default anonymous public-facing avatars would help disrupt this approach.⁵⁹ • Encouraging services to block adults from direct messaging children, unless a child has signalled that the user is trusted. • Highlighting the importance of considering preventative technologies in virtual reality and gaming spaces, like Meta’s Horizon Worlds ‘personal boundary’ function. <p><u>Action 8 on reporting</u></p>

⁵⁸ NSPCC (2025) [Targeting Girls Online: How online services enable the abuse and harassment of girls](#)

⁵⁹ NSPCC (2025) [Targeting Girls Online: How online services enable the abuse and harassment of girls](#)

Question	Your response
	<p>We are encouraged to see that case study 23 forefronts the need to be able to report offline behaviour. As mentioned in our response to question 2, <i>discussions of best practice on reporting should be strengthened by highlighting the need for improved collaboration across platforms concerning reported content.</i> This would particularly strengthen case study 23, which highlights the need to take further action against serial offenders but excludes the import of sharing this intelligence across services.</p> <p>As outlined in question 1, children often experience image based sexual abuse as a result of another child's actions and can report feeling increased barriers to reporting this behaviour.⁶⁰ The Guidance currently fails to address non-consensual peer-to-peer image sharing as a distinct and separate risk to adult-perpetrated CSA, and the different pressures girls experience and support needed. <i>The Guidance should highlight that platforms need to account for the risk of child-on-child abuse image sharing in the design of their reporting systems.</i> This could include adopting practices such as signposting children to child-focused reporting tools, like Childline and the IWF's Report Remove, and providing age-specific safety messaging, such as encouraging children to talk to a trusted adult in their lives about the harm they've experienced.</p> <p>Research⁶¹ cited by the Guidance found that on one mainstream social media platform, reporting a deepfake explicit image with the rationale that it was copyright infringement led to a 100% removal rate within 25 hours. This is in stark contrast to the 0% of comparable images removed after 3 weeks when content was reported as being shared non-consensually. <i>Services should be encouraged to share data concerning their prioritisation of content moderation and removal rate of reported content, including the reason for reporting.</i> This would offer tangible insight into issues raised in the Guidance, such as whether content moderators receive adequate training to be able to identify and appropriately action intimate image abuse.</p> <p><u>Action 9 on taking appropriate action post-reporting</u></p>

⁶⁰ Ofsted (2021) [Review of sexual abuse in schools and colleges](#)

⁶¹ Qiwei, L; Zhang, S; Kasper, A; Ashkinaze, J; Eaton, A; Schoenebeck, S; and Gilbert, E. (2025) [Reporting Non-Consensual Intimate Media: An Audit Study of Deepfakes](#)

Question	Your response
	<p>While we welcome case study 24's focus on training content moderators to effectively moderate domestic abuse reports, <i>it would be helpful for the Guidance to acknowledge the breadth of training and expertise that would support moderation teams in making effective decisions for all women and girls.</i> For example, as well as an awareness of cultural differences, content moderators would benefit from training on other areas such as LGBT+ experiences.</p> <p>Research found that of the three quarters of LGBT+ individuals who were dissatisfied with platform responses to their reports, 23% encountered a professional who had limited knowledge of LGBT+ issues and 7% had to disclose their sexual orientation or gender identity to several people to progress the report.⁶² This lack of knowledge and need for frequent disclosure can dissuade women and girls who are LGBT+ from reporting online abuse. It is important that the Guidance supports services to realise the breadth of training and specialisms necessary among content moderators to ensure that they can sensitively and appropriately support all women and girls.</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><u>Reporting on the Guidance</u></p> <p>Given its status as advisory, we were disappointed to see the lack of mechanisms identified to encourage service uptake of the Guidance and measure its impact. Waiting for a report on uptake in 2027 risks delaying the impetus for change and weakening the impact of the Guidance. A more effective alternative would be to pair this 18-month follow-up report with a baseline evaluation of current service practice. This evaluation should include engagement work with women and girls to understand their current experiences on platforms. Alongside signalling Ofcom's commitment to the Guidance, a baseline as-</p>

⁶² Hubbard, L. (2020) [Online Hate Crime Report: Challenging online homophobia, biphobia and transphobia](#). London: Galop

Question	Your response
	<p>assessment would likely incentivise more immediate, robust action from services, as well as generating insight to support future evaluation of the Guidance's impact.</p> <p>While the commitment to report on the impact of the Guidance is welcome, embedding a gender-sensitive approach to managing online harms will not be achieved through a 'one-and-done' approach. Just as services will need to maintain a clear commitment and ongoing action to deliver safer online experiences for women and girls, the need for scrutiny will be ongoing.</p> <p>Furthermore, it is vital that assessments of the uptake and impact of the Guidance directly incorporate the experiences of women and girls online. Measuring whether the Guidance is having its intended impact will ultimately depend on if women and girls' online lives become safer.</p> <p><i>Rather than a one-off report on Guidance uptake, the NSPCC recommends a baseline assessment followed by annual re-appraisals. This must include research with women and girls to track how their online experiences are changing.</i></p> <p><u>Structuring reports to be usable and comparable</u></p> <p>Ofcom must also consider the structure of reports. The Guidance's nine action areas establish a strong basis for domains of evaluation. Developing a rating system to analyse the uptake of good practice would add clarity for services and users alike and incentivise greater action. An easily deliverable approach would be to RAG rate services across the nine identified action areas. Similarly, a focus on digestibility, comparison and identification of emerging good practice in reporting will support cross-platform learning, media attention and reputational risk: all of which can incentivise greater Guidance uptake. Therefore, <i>the NSPCC encourages Ofcom to undertake a comparative analysis of platform uptake of the Guidance and deliver this in a clear, digestible way.</i></p> <p><u>Transparency reporting</u></p> <p>Ofcom's analysis of service uptake of the Guidance can generate useful data on online gender-based harms, however securing detailed internal data from companies remains critical. <i>We recommend that the Guidance is embedded into transparency notices.</i> Moreover, to sup-</p>

Question	Your response
	<p>port Ofcom’s reporting, and the data collected via transparency reporting, it will also be beneficial to request that services release public statements on how they are utilising the Guidance. This would supplement Ofcom’s work, add another indication of the importance Ofcom places on tackling online gender-based harm, and place the onus on services to explain how and where they are choosing to follow recommendations.</p> <p><u>Supervisory relationship</u></p> <p>Another enforcement mechanism that should be explored is the use of Ofcom’s supervisory relationships with services. The NSPCC endorses using the soft power and influence built through supervisory relationships to open service discussions on online gender-based harms and set clear expectations for service engagement with the Guidance. Making the Guidance a formalised part of supervisory relationships could take many forms, such as dedicated meetings, formal reporting mechanisms or a named relationship holder on addressing this area. What is important is that there is transparency, and hence accountability, concerning how the supervisory relationship will be used to incentivise uptake.</p> <p><u>Other ways to incentivise uptake: codifying Guidance</u></p> <p>Finally, to ensure that ‘best practice’ measures can be legally enforced as soon as possible, Ofcom should regularly review the Guidance. This should be done with the aim of identifying where there is sufficient evidence and it is proportionate to formalise measures by adding them to Codes.</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? – NA</p>
<p>Question 6: Do you agree that our draft Guidance is likely to have positive effects on opportunities to use</p>	<p>Confidential? – N</p> <p>The NSPCC welcomes that the draft Guidance directly references the duty to adhere to the Welsh Language Standards under the Welsh Language Measure (2011).</p>

Question	Your response
<p>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>We are also encouraged that a Welsh Language Impact Assessment has been conducted with regards to both the foundational and good practice steps in the Guidance.</p> <p>We note the recommendation that providers should have regard to the needs of their user base in considering what languages are needed when developing their policies (see action 1), user surveys (see action 2), information about account access (see action 5), and when designing their reporting processes (see action 8). The Guidance therefore sets out that it believes the proposals will treat Welsh no less favourably than English.⁶³ While conducting a Welsh Language impact assessment aligns with requirements under the Welsh Language Standards, there remain areas where the Guidance could, and should, go further to ensure that it has a positive effect on opportunities to use Welsh. This would also align with the realisation of children's rights under the UNCRC. As emphasised throughout this response, opportunities to use Welsh also need to be age-appropriate when it comes to provisions for girls and children.</p> <p><u>Key additions to the Guidance should include:</u></p> <ul style="list-style-type: none"> • <i>A clear commitment to engagement with Welsh speaking children and young people in the Welsh language</i> and a recognition of the Welsh language as an official language of Wales, will be key to maximising the positive effects of this Guidance on children's opportunity to use Welsh in contexts of protecting them from online gender-based harms. It would also be supportive of ensuring that Welsh is treated no less favourably than English. This aligns with points we raise above in this response, about the need for commitments to formal structures for ongoing engagement with children as part of the process of monitoring impact and incorporation of the Guidance. • <i>An age appropriate, and ideally co-produced, children and young person's version of the Guidance, being made available in English and</i>

⁶³ Ofcom (2025) [Consultation Document A safer life online for women and girls](#) Pg53

Question	Your response
	<p><i>Welsh as well as other languages</i>, would be a tangible way for Ofcom to align with the UNCRC and Welsh language standards.</p> <ul style="list-style-type: none"> • <i>Greater emphasis on the need for suitable provisions to ensure women and girls are offered clear information about reporting and the availability of reporting processes in Welsh, signposting to support both in Welsh and encouraging provision in Welsh.</i> This is an area where Ofcom can encourage services to show leadership, and the Guidance can both adhere to, and progress, the implementation of the Welsh language standards. • <i>Consideration of how the Guidance aligns to the approach in existing Welsh Government strategies and guidance on violence against women and girls</i> will be important in supporting its contextual relevance and uptake. Core documents to consider include: <ul style="list-style-type: none"> ○ ‘Violence against women, domestic abuse and sexual violence: blueprint high level action plan’⁶⁴ ○ ‘Violence against women, domestic abuse and sexual violence: strategy 2022 to 2026’⁶⁵ ○ ‘More Than Just Words: Five Year Plan (2022-2027)’,⁶⁶ which aims to ensure Welsh is integrated into services, so individuals receive appropriate care without needing to request it leading to better outcomes ○ ‘Welsh Government Violence against Women, Domestic Abuse and Sexual Violence (VAWDASV) National Communications Framework (2017-2020)’⁶⁷

⁶⁴ GOV.WALES (2023) [Violence against women, domestic abuse and sexual violence: blueprint high level action plan](#)

⁶⁵ GOV.WALES (2022) [Violence against women, domestic abuse and sexual violence: strategy 2022 to 2026](#)

⁶⁶ GOV.WALES (2022) [More than just words: Five Year Plan 2022-27](#)

⁶⁷ GOV.WALES (2018) [Welsh Government Violence against Women, Domestic Abuse and Sexual Violence \(VAWDASV\) National Communications Framework \(2017-2020\)](#)

Question	Your response
	<ul style="list-style-type: none"> ○ 'The Wales National Training Framework on violence against women, domestic abuse and sexual violence'⁶⁸ ○ 'Statutory Guidance for the Commissioning of VAWDASV Services in Wales'⁶⁹ ● Embedding such documents will ensure consistency and support Ofcom's Guidance to align with key Welsh Government recommendations such as the importance of ensuring support for victims of violence against women and girls is made available in Welsh to those that need, and those who choose to receive the support in Welsh.⁷⁰ <i>A similar approach should be recommended explicitly in the Guidance in relation to online violence against women and girls.</i>

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

⁶⁸ GOV.WALES (2016) [The National Training Framework on violence against women, domestic abuse and sexual violence: Statutory guidance under section 15 of the Violence against Women, Domestic Abuse and Sexual Violence \(Wales\) Act 2015 and section 60 of the Government of Wales Act 2006](#)

⁶⁹ GOV.WALES (2019) [Violence Against Women, Domestic Abuse and Sexual Violence \(VAWDASV\) Statutory Guidance for the Commissioning of VAWDASV Services in Wales](#)

⁷⁰ GOV.WALES (2018) [The Violence against Women, Domestic Abuse and Sexual Violence \(Wales\) Act 2015: Guidance for Local Strategies](#)