



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>We have a commissioned service in our school across Derbyshire that delivers programmes called i-vengers they welcome Ofcom's draft guidance "A Safer Life Online for Women and Girls" and wholeheartedly welcome the recognition that more must be done to protect women and girls from online harm. This is a much needed and encouraging step forward towards creating a digital environment where everyone, regardless of gender, can thrive safely and with confidence.</p> <p>At i-vengers, we strongly believe that addressing issues such as online misogyny, gender-based harassment, and harmful stereotypes must begin early. Our peer-led digital leader programme empowers children and young people, including those with special educational needs and disabilities (SEND), to recognise unsafe behaviour, challenge harmful attitudes, and become positive role models in their school communities.</p> <p>By equipping young people with the tools, language, and confidence to speak out, the i-vengers programme plays a vital role in fostering respectful, inclusive digital cultures from the ground up. We are proud to support schools in tackling violence against women and girls online at its roots, promoting kindness, equality, and empathy as core values from an early age.</p>
<p>Question 2: Do you have any comments on the nine proposed actions? Please provide evidence to support your answer.</p>	<p>Having looked at the comments of the nine proposed actions we worked with the Commissioning Team and Force colleagues to highlight some of our feedback below.</p> <p>Taking responsibilities</p> <p>Point 1. Ensure that governance and accountability processes address online gender-based harm, for example by consulting subject matter experts and setting policies that prohibit these harms.</p> <p>Point 2. Conduct risk assessments that focus on harms to women and girls, for example by engaging with survivors and victims and conducting user surveys.</p>

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	<p>Point 3. Be transparent about women and girls’ online safety, for example through sharing information about the prevalence of harms on a service and the effectiveness of safety measures.</p> <p>These are good ambitions/recommendation but I’m not sure if points 1 & 2 could be enforced? There are various online providers and who is going to be available to check they are adhering to this request. Is it realistic for providers to complete Risk assessments, engaging with survivors?</p> <p>Preventing harm</p> <p>Point 4. Conduct abusability evaluations and product testing, for example by using red teaming to identify ways malicious actors may try to use service features to perpetrate harm.</p> <p>Point 5. Set safer defaults, for example by ‘bundling’ default settings together to make it easier for women experiencing pile-ons to secure their accounts.</p> <p>Point 6. Reduce the circulation of online gender-based harm, for example by using hash matching to detect and remove intimate images shared without consent.</p> <p>Points 4 – 6 are all things that could be adopted by the companies easily and are realistically achievable.</p> <p>Supporting women and girls</p> <p>Point 7. Give users better control over their experiences, for example by providing the option to block multiple accounts at once.</p> <p>Point 8. Enable users who experience online gender-based harm to make reports, for example by building reporting systems designed in a way that is supportive and accessible for those experiencing domestic abuse.</p> <p>Point 9. Take appropriate action when online gender-based harm occurs, for example by taking action against users who repeatedly violate the service’s policies.</p> <p>Again Points 7 – 9 are realistic and could be adopted by Tech companies with relative ease.</p>

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	<p>We look forward to seeing how this guidance will support schools, families, and platforms to take coordinated action – and we remain committed to playing our part in building a safer online world for all.</p> <p>That said, while we fully support the aims of the guidance, we believe there are some areas that could be strengthened to ensure the impact is both meaningful and lasting. Our comments below are offered in a constructive spirit, with the hope that they contribute to the guidance becoming even more robust and inclusive.</p> <p>We also suggest that online accounts should have 2 Factor Authentication as standard, rather than optional. Over 90% of our victims have suffered account compromise. Not only would this help reduce cyber-crime generally, it would also help in cases of domestic abuse and stalking, as it reduces the possibility of perpetrators being able to access accounts freely.</p> <p>We also think it should feature at account set-up: opportunities to be able to recover accounts. Many victims of hacking, whether the perpetrator is known or not, lose their accounts permanently.</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>Is it realistic for providers to complete Risk assessments?</p> <p>How realistic is it to engage with survivors – if it’s not policy or legislated, how do we ensure companies have the appropriate support and specialist required?</p> <p>There are various online providers and who is going to be available to check they are adhering to this request.</p> <p>Voluntary Compliance May Limit Impact</p> <p>The guidance presents a set of recommended actions for platforms, but these are not mandatory. We are concerned that without enforceable requirements, platforms may not feel compelled to make substantial changes, particularly where those changes conflict with commercial priorities. Clearer mechanisms for accountability and compliance would greatly enhance the guidance’s effectiveness.</p> <p>Lack of Clarity Around ‘Legal but Harmful’ Content</p> <p>We understand the intention to address content that is harmful yet not illegal, such as online misogyny. However, the term “legal but harmful” remains vague. Without clearer definitions, there is a risk of inconsistent enforcement or even accusations of overreach. More precise language and illustrative examples could help clarify expectations and avoid confusion.</p>

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	<p>Risk of Over-Censorship While we agree that harmful content must be tackled, we would caution against measures that may lead platforms to over-censor. In their eagerness to stay on the right side of regulators, platforms might apply blunt moderation tools that silence legitimate discussion or disproportionately impact marginalised voices. It's important that moderation remains proportionate, transparent and rights-respecting.</p> <p>Over-Reliance on User Reporting The guidance leans heavily on reporting mechanisms, which place the responsibility on those experiencing harm to raise the alarm. In practice, many women and girls may be reluctant or unable to report incidents, especially if they have previously had negative experiences doing so. A more proactive approach, including improved automated detection and human moderation, could help.</p> <p>Intersectionality Needs Greater Emphasis We appreciate the focus on women and girls, but more explicit consideration of intersectional experiences would add value. Gender does not exist in isolation; racism, ableism, transphobia and other forms of discrimination often intersect online. By embedding intersectionality more fully into the guidance, we can better ensure no one is left behind.</p> <p>Whilst I applaud any efforts in terms of making reporting easier, the fact remains that the likes of Meta do very little when you do report. I report dozens of accounts and posts every week, and I'd say I get a reply for less than 5%, and very, very rarely, in fact, almost never, is there any action taken. This has included blatantly illegal posts and accounts selling counterfeit currency, driving licenses, fake businesses, copycat business pages of legitimate companies, etc.</p> <p>I have also had no joy reporting things that were horrendously homophobic, sexist, etc. In fact, Facebook actually closed my account down and left the overtly homophobic group remain! This highlights a serious gap in enforcement and moderation practices that needs urgent attention.</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</p>	<p>Is it realistic for providers to complete Risk assessments?</p> <p>How realistic is it to engage with survivors – if it's not policy or legislated, how do we ensure companies have the appropriate support and specialist required?</p> <p>There are various online providers and who is going to be available to check they are adhering to this request.</p>

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<p>encourage providers to take up the 'good practice' recommendations?</p>	<p>Absence of Measurable Outcomes</p> <p>We would encourage Ofcom to include clearer metrics for success. Without defined benchmarks or indicators, it will be difficult to assess whether the guidance is having its intended effect. Setting out what "good" looks like would help both platforms and users understand how progress is being measured.</p> <p>We're encouraged to see Ofcom placing the safety of women and girls online at the heart of its approach. This draft guidance represents a strong foundation, and with thoughtful refinements, particularly around accountability, clarity, and inclusivity, it has the potential to drive meaningful and lasting change. We welcome the opportunity for continued dialogue and collaboration on this vital issue.</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>We support the inclusion of these assessments and believe they are essential to ensuring the guidance is fair, inclusive, and effective. However, we reiterate the importance of embedding intersectionality more explicitly throughout the guidance and assessments. This will help ensure that the diverse experiences of women and girls – particularly those from marginalised communities – are fully considered and addressed.</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>We have no specific concerns regarding the treatment of the Welsh language in the draft guidance. We support efforts to ensure that all users, regardless of language, can access safety resources and protections equally. Ensuring that guidance and support materials are available in both Welsh and English is a positive step toward inclusivity.</p>

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