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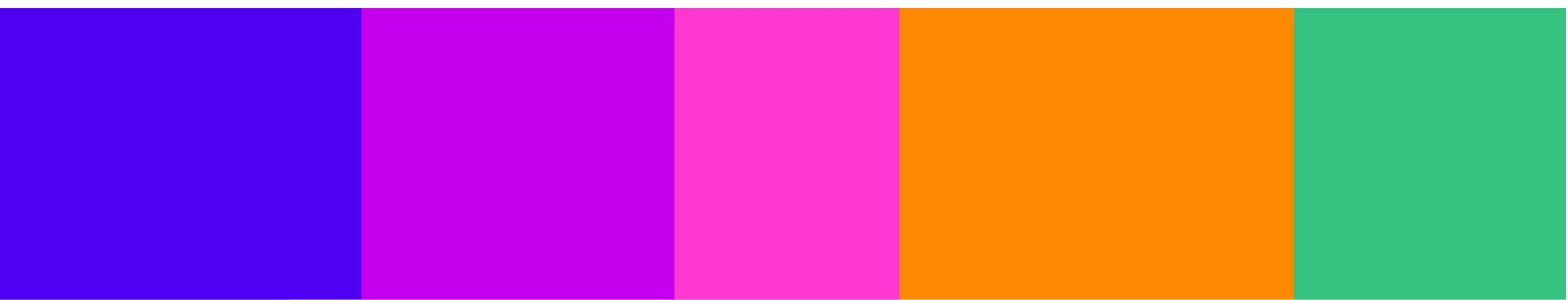
## Your response

SWGfL welcomes Ofcom's draft guidance on improving online safety for women and girls but we highlight several critical gaps that must be addressed for the guidance to be effective. While the four-harm framework is a useful starting point, it omits key forms of gendered abuse, particularly doxxing, impersonation, and culturally sensitive image misuse, which do not fall within current definitions of intimate image abuse yet cause significant harm. A case study from Report Harmful Content illustrates how this type of abuse disproportionately impacts women from minoritised backgrounds and is not recognised under platform policies or the law.

Much of the guidance places responsibility on women and girls to protect themselves, through safer defaults or reporting systems, rather than requiring platforms to proactively prevent abuse. Only one of the nine actions directly targets harm reduction. We argue that good practice must be enforceable and platform accountability must be central. Voluntary compliance has failed to deliver safety at scale. Platforms must be mandated to implement proactive measures, including StopNCII.org, hashing on upload, and trauma-informed reporting systems.

The Revenge Porn Helpline has supported over 70,000 victims and reported more than 420,000 images, over 98% of which are of women. This frontline experience shows the urgent need for faster redress, a UK NCII registry, and mandatory adoption of protective technologies. We also call for the introduction of a civil redress mechanism to help survivors secure image removal and compensation without costly legal action.

Finally, sustainable public funding is vital to support survivors and maintain frontline services. Ofcom must use its influence to embed these changes into statutory codes and drive systemic reform. Without enforceable obligations, survivors will continue to be failed by slow, fragmented, and inconsistent protections. The guidance must go beyond recommendations to mandate action where platforms have long fallen short.



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Question	Your response
<p><b>Question 1:</b> 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>1. We welcome the structured focus on four types of online gender-based harm, online misogyny, pile-ons and harassment, online domestic abuse, and image-based sexual abuse, as a strong foundation for recognising the disproportionate impact of these harms on women and girls. However, there are important gaps and limitations in the current framing that risk undermining the comprehensiveness and practical value of the guidance.</p> <p>While the guidance acknowledges the specific online harms disproportionately affecting women and girls, there is insufficient emphasis on how these harms are often deeply entangled with offline abuse, control, and violence. For many survivors, online abuse is not an isolated incident but part of a broader pattern of harassment, coercive control, stalking, or domestic abuse that transcends digital spaces.</p> <p>Our experience supporting thousands of survivors through the Revenge Porn Helpline and Report Harmful Content services shows that intimate image abuse, doxxing, and digital monitoring frequently occur alongside or as extensions of offline threats, including physical</p>
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	<p>violence, blackmail, or economic abuse. Survivors are often required to demonstrate “real-world” impact to receive platform support or takedown action, yet platforms rarely acknowledge that the online content is itself a continuation of offline harm. This omission has practical consequences: content is often misclassified or dismissed because it appears “non-violent” in isolation. We recommend that Ofcom embed a stronger recognition of the continuum between offline and online abuse, and explicitly direct platforms to assess and act on reports with this dynamic in mind.</p> <p><b>2. Doxing and privacy violations must be recognised as distinct gendered harms</b></p> <p>The current four-harm structure omits a significant and growing form of gender-based abuse: doxing and privacy-based violations. These often occur as part of coordinated harassment or culturally sensitive abuse, including in honour-based violence, stalking, or attempts to out LGBTQ+ individuals. Such abuse is especially common in culturally sensitive cases, where public exposure, such as publishing an address, revealing sexual identity, or leaking private conversations, can carry devastating consequences, including offline violence.</p> <p>These forms of harm are not clearly covered under the current categories and often fall through the cracks in platform enforcement. Moreover, they are not always considered “illegal content” under platform policies despite their recognised role in facilitating stalking, coercive control, and sexual violence. We recommend that Ofcom expands its framework to explicitly address doxing and digital privacy abuse as standalone forms of gender-based harm and work with survivor services and civil society to build case study evidence of their impact.</p> <p>Case study example</p> <p><i>In 2023, Report Harmful Content received a rising number of reports involving malicious impersonation targeting women from culturally sensitive backgrounds. One such case involved Aaliya (pseudonym), a woman whose experience illustrates a critical gap in how online abuse is currently defined and addressed.</i></p>
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	<p><i>Aaliya discovered that her ex-partner had created a fake social media profile using her real name and photographs, without her consent. The images used were not nude or explicitly sexual—yet they were deeply personal, including photos of Aaliya without culturally appropriate dress, or showing public displays of affection that could carry severe reputational and social consequences within her community.</i></p> <p><i>The impersonating account included degrading captions, such as “your local bisexual mommy,” clearly intended to humiliate, shame, and ostracise her from her community. Despite the significant emotional and cultural impact, this form of abuse does not meet the legal definition of intimate image abuse, as the images were not sexually explicit under UK law.</i></p> <p><i>The Report Harmful Content service removed a total of 188 individual impersonation accounts linked to Aaliya across multiple platforms. In total, 253 impersonating profiles were removed in 2023, all designed to harass and degrade victims—many of whom were targeted in similarly culturally specific ways.</i></p> <p><i>The impact on Aaliya has been profound. She reported severe emotional distress and a loss of community standing. Like others in similar situations, she has found herself unable to return to her home country due to the shame and stigma brought upon her and her family.</i></p> <p><b>3. Insights from the NCII roundtable: trauma-informed and survivor-centred policy design</b></p> <p>At the NCII roundtable hosted by SWGfL in 2024, stakeholders, including law enforcement, tech companies, academics, and survivor support organisations, agreed that current platform tools are not trauma-informed, reporting tools are rigid and limited to narrow category selections and they lack in survivor support throughout the reporting process.</p> <p>Survivors repeatedly emphasised the need for narrative-driven reporting mechanisms, the ability to flag multi-dimensional abuse, and the option to explain cultural or contextual significance (e.g. how even a partially clothed image may be life-threatening in honour-based violence</p>
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	<p>contexts). Ofcom should reflect these findings in its guidance to platforms, urging them to move beyond checklist-style moderation systems and adopt responsive, culturally competent practices.</p> <p>The Government should create guidance for internet infrastructure providers and web browser manufacturers on tackling online nonconsensual intimate image abuse, similar to that which already exists for online child sexual exploitation and abuse. This guidance should direct both groups to make use of a designated expert body’s registry of NCII material. While there is no legal obligation to act in accordance with the guidance—and we understand the current voluntary approach with CSAM is working—the Government should do all it can to encourage companies to follow it, with a view to potential legislative solutions if there is insufficient take up.</p> <p><b>4. Clarifying the limits of “illegality” and the need for Ofcom to address harmful-but-legal content under its remit for Priority Proactive Content (PPC)</b></p> <p>While we recognise Ofcom must operate within the legal definitions set out by the Online Safety Act 2023, we are concerned that the current reliance on illegality as the primary threshold for content intervention risks leaving significant gendered harms unaddressed. Many forms of image-based abuse and online misogyny remain legally ambiguous or are not prosecuted in practice, despite their demonstrable role in facilitating coercion, control, and psychological harm.</p> <p>SWGfL’s work with the Revenge Porn Helpline and StopNCII.org has highlighted that between 5% and 10% of reported intimate image abuse content remains legally accessible and publicly viewable online, often because it does not meet the narrow legal definition of ‘explicit’ or because law enforcement and platforms require an undue burden of proof before acting (source). Similarly, prosecutors and police have been slow to act on perpetrators’ continued possession of intimate images, even when court orders or survivor protection should mandate their removal (source).</p>
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	<p>These enforcement gaps result in platform policies that mirror the same reluctance to act, perpetuating harm by treating abuse as ‘non-actionable’ unless a conviction or explicit illegality is proven</p> <p>We therefore encourage Ofcom to:</p> <p>Explicitly reference Priority Proactive Content (PPC) as a framework for regulating harmful-but-legal behaviours, particularly in the context of gender-based abuse that may not always meet legal thresholds but still causes serious harm.</p> <p>Acknowledge the chilling effect of narrow legalistic approaches, particularly for victims in marginalised or culturally sensitive communities, and the need for a risk- and impact-led approach to enforcement.</p> <p>Signal to platforms that harms disproportionately affecting women and girls require preventative and remedial responses beyond criminal thresholds, in line with the duty of care envisioned by the Act.</p> <p>By doing so, Ofcom can help ensure that its guidance does not inadvertently reproduce the very limitations in enforcement that allow abuse to persist unchecked."</p>
<p><b>Question 2:</b> Do you have any comments on the nine proposed actions? Please provide evidence to support your answer.</p>	<p>Confidential? – N</p> <p><b>Action 1: Ensure accountability processes address online gender-based harm</b></p> <p>We welcome the emphasis on governance and consultation with subject matter experts. However, it is unclear if this refers to an independent oversight mechanism (e.g., ADR or compliance audits). An alternative dispute resolution mechanism is essential to ensure that victims have the right to appeal where their content is not removed.</p> <p>We recommend that Ofcom:</p>
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	<ul style="list-style-type: none"><li>• Clarify the accountability structure and whether it includes external oversight;</li><li>• Require survivor-led organisations and frontline practitioners to be embedded in design processes;</li><li>• Expedite the research report on alternative dispute resolution as recommended in the Online Safety Act 2023;</li><li>• Ensure staff training evolves with new and emerging harms, including AI-enabled abuse and collector culture.</li></ul> <p>Extract from the WEC report on NCII:</p> <p><i>Yet, like David Wright, Professors of Law Clare McGlynn and Lorna Woods described Ofcom’s powers under the OSA as “not designed to provide individuals with redress”; Professor McGlynn described them as being “wholly inadequate for this purpose”. Their evidence described the OSA as being “designed to incentivise service providers into designing and running their services better, including by providing better complaints mechanisms”. Although Ofcom does have an online complaints portal, the accompanying information makes clear that “Ofcom is not able to respond to or adjudicate on individual complaints”.</i></p> <p><b>Action 3: Be transparent about women and girls’ online safety</b></p> <p>We support this action as a critical lever for change. Transparency reporting will pressure other providers to align with best practice, rather than offer abusers “safe haven” platforms. However, transparency must include disaggregated data by gender, type of abuse, and platform function, clear outcomes of reporting (removals, timelines, appeals upheld) and public ranking or assessment (see Question 4) to drive market-based accountability.</p> <p><b>Action 5: Set safer defaults</b></p>
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	<p>We support the use of safer default settings, such as bundling privacy tools to protect against pile-ons. However, these cannot be implemented in isolation. This action risks reinforcing the idea that it is up to women to modify their experience to avoid abuse, rather than addressing why abuse is so widespread to begin with. Without changes to algorithmic promotion of harmful content or stricter enforcement against abusers, lack of deterrence messaging, safer defaults alone will not create meaningful protection.</p> <p><b>Action 6: Reduce the circulation of online gender-based harm</b></p> <p>Only Action 6 directly focuses on reducing online gender-based harm. While the rest are ostensibly designed to support this goal, several actions, particularly under the “Preventing Harm” and “Supporting Women and Girls” pillars, are weighted toward empowering women to mitigate their own victimisation, rather than ensuring platforms eliminate harmful system design and hold perpetrators to account. This reinforces <b>a culture of ‘safety work’ that forces women and girls to manage their own risk, rather than requiring platforms to design abuse-resistant systems by default.</b> Ofcom’s own guidance acknowledges this problem (Annex A, 2.6), yet the recommendations fall short of addressing it. Platforms must be responsible for ensuring their services are not weaponised by perpetrators, and this must be non-optional.</p> <p>We recommend that Ofcom strengthen this action to include further measures to reduce the circulation of gender-based harms, including the mandatory use of StopNCII.org technology and an infrastructure to create an NCII registry.</p> <p>Extract from the WEC NCII report:</p> <p><b><i>The Government should create guidance for internet infrastructure providers and web browser manufacturers on tackling online nonconsensual intimate image abuse, similar to that which already exists for online</i></b></p>
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	<p><i>child sexual exploitation and abuse. This guidance should direct both groups to make use of a designated expert body’s registry of NCII material. While there is no legal obligation to act in accordance with the guidance—and we understand the current voluntary approach with CSAM is working—the Government should do all it can to encourage companies to follow it, with a view to potential legislative solutions if there is insufficient take up.</i></p> <p><b>Action 8: Enable users to report gender-based harm</b></p> <p>We strongly support efforts to improve reporting systems, but current mechanisms are inadequate. Reports to the Revenge Porn Helpline show that survivors often cannot describe multi-layered abuse, are forced to select from rigid categories, and receive little feedback. We recommend that this action is reinforced to include narrative-driven reporting tools that allow users to explain context, options for multi-issue reports, recognising that abuse is rarely isolated, and platforms utilise and communicate a clearly defined gender-based harm policy, so users know what breaches terms and how to report it.</p> <p>Survivors need speed, not just accuracy. Current removal mechanisms are too slow. The Women and Equalities Committee’s recommendation for a civil redress mechanism was rejected by the UK Government, leaving no realistic path for most victims. Ofcom must reference the need for expedited removal and blocking procedures and push providers to mirror the expediency principles of international best practice, such as British Columbia’s NCII takedown tribunal.</p> <p>Recommendation from the WEC report on NCII:</p> <p><i>Ofcom’s current enforcement powers, while welcome, are far too slow and not designed to help individual victims get abusive images of themselves on non-compliant websites taken down or have access to them restricted. The duties under the regulatory regime created by the Online Safety Act are a good start. However, further steps are required to effectively tackle the threat posed by NCII at an individual level, particularly where content is hosted overseas.</i></p>
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**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.

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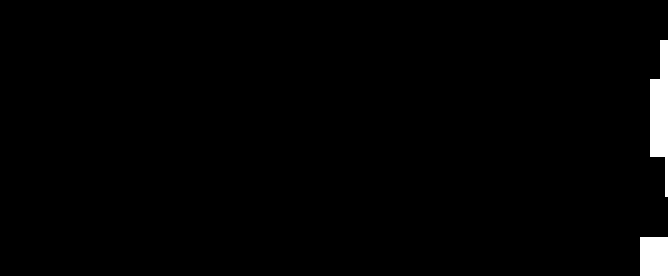


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<p><b>Question 4:</b> Do you have any feedback on our approach to encouraging providers to follow this guidance, including our proposal to publishing an assessment of how providers are addressing women and girls' safety? Do you have any examples or suggestions of other ways we could encourage providers to take up the 'good practice' recommendations?</p>	<p>Confidential? – N</p> <p>We support Ofcom's intention to publish a public assessment 18 months after the final guidance is issued. However, we are concerned that without stronger regulatory levers or consequences for inaction, the current approach risks being too passive to drive the scale of change required. In particular, Ofcom's reliance on voluntary uptake of non-binding guidance will not shift industry standards unless accompanied by robust accountability mechanisms. The Governments' recent rejection</p>
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	<p>of the Women and Equalities Committee recommendations on NCII reinforces the need for swift action in this area.</p> <p>We make the following recommendations:</p> <p><b>1. Elevate Good Practice into Enforceable Codes</b></p> <p>Ofcom should move beyond merely “encouraging” providers to adopt good practice by making key interventions part of statutory Codes, particularly those with proven effectiveness and high relevance to mitigating gender-based harm. This has not worked previously with platforms and there is insufficient evidence to assume that it will work going forward. Currently, platforms can claim to take gender-based harm seriously while continuing to allow the same types of harm to proliferate unchecked. Turning core good practices into enforceable Codes will level the playing field and set clear expectations.</p> <p><b>2. Make hashing and proactive NCII prevention non-negotiable</b></p> <p>The current guidance includes hash-matching only as an optional good practice. Given the severe and long-lasting harm caused by non-consensual intimate image (NCII) abuse, this is inadequate. We urge Ofcom to make hash-matching a foundational requirement for all platforms with image-sharing functions.</p> <p>This recommendation is grounded in Ofcom’s own data, as well as frontline service experience. Since establishing in 2015, the Revenge Porn Helpline has supported over 70,000 victims through the reporting of more than 415,000 images, with a 94% success rate in takedown requests, a clear demonstration of the effectiveness of hash-based tools.</p> <p><b>3. Guarantee sustainable funding for frontline services</b></p> <p>The impact of the guidance will be significantly limited without long-term, sustainable funding for the services supporting victims and survivors. The Revenge Porn Helpline, which supports thousands of adults each year, plays an irreplaceable role in providing direct and practical support to victim-survivors. The Helpline uses insights and data to play a larger role in advocating for systemic change through advising platforms on abuse patterns</p>
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	<p>and emerging threats and delivering data-driven insights to regulators and policymakers.</p> <p>Extract from the Women Equalities Committee on NCII</p> <p><b><i>Research has shown that 1 in 14 adults in England and Wales, including 1 in 7 women and 1 in 9 men aged 18–34, have had or have experienced threats to have their intimate or sexual images shared. Since 2015, the Revenge Porn Helpline, which is run by the charity South West Grid for Learning (SWGfL) to assist adults in the UK to get their content taken down, has reported approximately 338,000 intimate images to platforms for removal, 306,000 of which have been successfully removed from the internet.</i></b></p> <p><b><i>The Helpline has seen a surge in demand. David Wright CBE, Chief Executive of SWGfL, told our predecessor Committee: in 2019 we managed 1,600 cases; that doubled in 2020, we think fuelled by covid, to 3,200, then to 4,400 in 2021, 8,900 in 2022 and then last year, we only published this data yesterday, it was just under 19,000 cases. So, we have seen a tenfold increase in four years. Figures for 2024 show the caseload increasing further, with the Helpline having received 22,276 cases. These figures only include those reporting to the Helpline, there are many more individuals who do not.</i></b></p> <p><b><i>NCII is a deeply gendered threat. In 2023, 71% of reports received by the Revenge Porn Helpline were made by women (where the client’s gender was known). In cases where the gender of the perpetrator was known, over 81% were male, with 67% of the offenders being a current or former partner. On average, women experienced over 28 times more images being shared than men. However, in sextortion cases, nearly 93% of cases involved male victims, with the perpetrators consisting predominantly of organised criminal gangs, potentially based abroad.</i></b></p> <p>Currently, this work is only part-funded by the Home Office and Scottish Government. If Ofcom is serious about meaningful, system-wide change, it must use its convening power to advocate for permanent financial support to the organisations providing survivor-centred redress.</p>
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	<p><b>4. Strengthen the public accountability model</b></p> <p>While the proposed assessment of provider performance is welcome, Ofcom must go further to thoroughly ensure the aims of the guidance are met. This could include public naming of underperforming services and use a traffic light system or scorecard with clear criteria such as:</p> <ul style="list-style-type: none"><li>• Use of NCII hashing</li><li>• Timeliness of response to reports</li><li>• Presence of gender-based harm policies</li><li>• User satisfaction with reporting outcomes.</li></ul> <p>Transparency without accountability risks reinforcing performative compliance. The public deserves to know which services take safety seriously and which do not.</p> <p><b>5. Introduce incentives and penalties</b></p> <p>Ofcom must develop a clearer strategy for driving meaningful uptake of good practice by combining positive incentives with regulatory consequences. At present, the guidance lacks sufficient weight to compel action from platforms whose design choices enable or amplify harm. Voluntary compliance, without a framework of reward and penalty, will not deliver the scale of change needed.</p> <p>We recommend Ofcom introduce a “Gender-Safe Platform” accreditation scheme or similar public recognition system to reward services that go beyond the minimum expectations. This could include tiers (e.g. bronze, silver, gold) based on the adoption of high-impact interventions such as hashing on upload, participation in StopNCII.org, transparent moderation reporting, or the integration of trauma-informed reporting systems. Publicly recognising leadership would create market-based incentives for platforms, particularly those reliant on public trust, advertising, or competitive positioning.</p> <p>Conversely, services that repeatedly fail to adopt key good practices, especially in high-risk environments like adult content platforms or encrypted services, should face enhanced scrutiny and regulatory engagement. This might include a requirement to submit remedial action plans, increased audit frequency, or public flagging as high-risk. Persistent inaction should be considered as evi-</p>
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	<p>dence of failure to meet foundational safety duties under the Act, triggering formal enforcement where appropriate.</p> <p>Finally, Ofcom should clarify that the adoption of good practice will influence how it assesses compliance with wider online safety obligations. Failure to act, especially on well-evidenced harms such as NCII, synthetic abuse, or inadequate reporting systems, should be viewed as a material risk factor.</p> <p><b>6. Mandate platform design assessments as part of annual compliance</b></p> <p>Design choices drive harm. As highlighted in DSIT’s report on platform design and VAWG, features like open messaging, lack of user verification, or anonymity without moderation create conditions for abuse. Ofcom should require platforms to undertake annual abuse risk audits based on platform design, include external consultation with survivors and civil society in those assessments and publish summaries of these audits as part of their transparency obligations.</p> <p><b>7. Support the long-term development of a coordinated NCII Clearing Centre</b></p> <p>Ofcom’s current framework rightly focuses on improving platform-level standards, but where platforms fail to act—or when content persists across multiple services—a centralised escalation mechanism is needed. While this falls outside Ofcom’s statutory powers under the Online Safety Act, we strongly recommend that Ofcom signal the strategic need for a coordinated national or international NCII clearing centre, similar in function to the National Center for Missing &amp; Exploited Children (NCMEC) in the United States.</p> <p>NCMEC serves as a trusted intermediary between the public, law enforcement, and industry, enabling the secure, verified reporting and coordinated removal of child sexual abuse material. No such mechanism exists for verified non-consensual intimate images, despite their profound and often lifelong impact on victims.</p> <p>Recent data published by SWGfL further reinforces the case for such infrastructure. Our <i>2025 Global NCII Data</i></p>
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	<p><i>Report</i> highlights that NCII abuse is likely to affect more than 369,000 women annually in the UK and as many as 50 million women globally, placing the scale of this abuse beyond that of CSAM. Yet, while CSAM benefits from structured, cross-platform enforcement and reporting systems such as NCMEC and IWF, survivors of NCII are often left to navigate takedown alone, without a centralised route for redress. The development of an NCII Clearing Centre, as proposed by SWGfL, would provide this missing layer of coordinated enforcement, prioritising content confirmed by survivors, trusted NGOs, or legal orders, and reducing the current burden on individuals to secure removals from dozens of platforms.</p> <p><a href="#"><u>Source: SWGfL, <i>The Scale of Non-Consensual Intimate Image Abuse: A Data-Driven Global Analysis</i> (March 2025)</u></a></p> <p>We are developing a proposal—based on our operational experience through the Revenge Porn Helpline and StopNCII.org—to support the phased creation of an <b>NCII Clearing Centre</b>. This would allow trusted partners (such as NGOs, legal representatives, and potentially law enforcement) to:</p> <ul style="list-style-type: none"><li>• Submit verified NCII content (hashes, URLs, case metadata) into a shared register;</li><li>• Coordinate cross-platform takedown requests and notifications;</li><li>• Prioritise content linked to successful prosecutions, civil redress orders, or police investigation;</li><li>• Track response timelines and identify systemic platform failures.</li></ul> <p>This would not replace platform-level moderation but would act as an enforcement backstop—an instrument of last resort—where content remains live despite repeated victim reporting or legal proceedings. It would also reduce victim trauma by preventing the need for repeat self-disclosure across multiple services.</p> <p>Although legislative action would be required to establish such a centre formally, Ofcom’s guidance should acknowledge this gap and consider recommending that Government prioritise the development of a trusted NCII</p>
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	<p>escalation mechanism, mirroring the success of CSAM frameworks such as NCMEC and the Internet Watch Foundation.</p> <p>Such a system would not only strengthen victim support but send a clear signal that image-based abuse warrants equal systemic response to other severe online harms.</p>
<p><b>Question 5:</b> 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>Please refer to the Online Safety Act Network’s response to this question</p>
<p><b>Question 6:</b> 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? – Y / N</p>

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