

# University of York

## Your response

Question	Your response
<p>PLEASE NOTE THAT NONE OF THE SUBMITTED RESPONSES ARE CONFIDENTIAL</p>	
<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>Whilst it is now commonplace in policy development and analysis to combine the threats posed to women and girls, it is crucial to recognise that there are important differences between the two groups. I am concerned that by adopting the neologism "VAWG" throughout the guidance given to tech companies, these differences will be overlooked, and serious harms to adult women will continue unabated.</p> <p>It is important to recognise within the new regulations, that the abuse that adult women experience online is multifaceted, and therefore that it causes harm in multiple ways. I would argue that it is imperative that each of these harms is addressed through robust and responsive regulation. My own academic research in this area (e.g. Watson, 2024; Watson, 2023; Watson, 2022) has shown that the online abuse and harm experienced by women working in the public sphere consists of seven key elements:</p> <ol style="list-style-type: none"><li>1. Belittlement</li><li>2. Criticism of appearance</li><li>3. Emotional harm</li><li>4. Harassment</li><li>5. Silencing</li><li>6. Threat</li><li>7. Defamation</li></ol> <p>My empirical research, gathered from interviews and the qualitative analysis of X / Twitter data discovered that at least one of these elements is present in every abusive encounter. My study also demonstrated that the online abuse directed at women is misogynistic, frequently includes violent threats, and dismisses women's contributions to online discussions.</p> <p>My work has also identified that gendered online abuse can differ by occupation, with police officers most likely to receive abuse that denigrates their ability or appearance; politicians and journalists more likely to</p>

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	<p>receive violent threats, and academics receiving abuse of all types. As briefly mentioned in the consultation document, intersectionality also has an impact, with women who have multiple intertwined identities (e.g. race, disability, sexuality) experiencing even greater abuse.</p> <p>To treat adult women and girls as one homogenous group, as evidenced through the descriptor “VAWG” ignores these important nuances, and risks any protections being inadequate.</p> <p>I (and others) have serious concerns that the legislation provided within the Online Safety Act (2023) has done little (so far) to implement the robust regulatory frameworks, and the necessary changes in policing that are required to effectively tackle the online abuse of adult women, which continuously sees women – especially those working in public facing occupations – subjected to harassment in the online space.</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><b><i>My Doctorate in Social Policy (awarded in 2022) considered the impact of online abuse on women working in the public sphere. I am drawing upon empirical evidence gathered from the interviews I undertook with 50 women working across the public facing occupations of academia, journalism, policing and politics, as the basis for my answers in this section. All quotes are genuine, but names have been replaced with pseudonyms, to abide by the ethical safeguards laid down by the University of York.</i></b></p> <p style="text-align: center;"><b>1. Ensure that governance and accountability processes address online gender- based harm</b></p> <p>For the reasons outlined in Q1, there remains a need for a robust regulatory framework to effectively tackle the online abuse of adult women. All participants in my research identified a need for the greater regulation of online platforms, as these quotes illustrate:</p> <p><b><i>“Regulation is very important. Regulation ensures that we keep [social media] companies accountable, and accountability and transparency are the cornerstones of any healthy, democratic society.”</i></b> [Jacqueline, Academic]</p>

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	<p><b><i>“The online space shouldn’t be lawless anymore. We need to figure out some rules and regulations about this. Women shouldn’t have to change their behaviour. We’ve all moved online, let’s make it a better place to live.”</i></b> [Christie, Academic]</p> <p><b><i>“Long term, we need better legislative change. We need a framework that looks at online harms, and the definition of it, and making sure it’s intersectional. We need tech companies to look at moderation and invest in it properly. We need tech companies to be designing platforms with safety by design as its core principle, rather than profit.”</i></b> [Souad, Academic]</p> <p>Some of the women I spoke to felt that tougher state regulation of online platforms was necessary because social media companies could not be trusted to implement the various improvements required without a legal obligation to do so:</p> <p><b><i>“They feed off dissent. They feed off rage. That’s how they make money. They can’t even be trusted to keep their house in order, so I don’t think they are anywhere near to knowing how to address gender-based violence properly. I don’t trust them to act on it, because they don’t. They make money from not very ethical ways. So, they’re not driven to find a solution. It would have to come from policy level.”</i></b> [Nicole, Academic]</p> <p><b><i>“We need to hold the social media companies to account. Government legislation on social media companies is long overdue. Because they’re not going to self-correct, because they’ve got no incentive to do that. We can’t wait for the US because they’re never going to catch up quick enough with us...”</i></b> [Michelle, Journalist]</p> <p><b><i>“I think more regulation is required. If social media is going to be used for responsible reasons, and that’s why it was designed, then they do need to exercise more control over the platform, because it’s not a free platform, it is owned by a company that I think should have more regulated responsibilities for how that platform is used. Like any other profit-making</i></b></p>

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	<p><i>company, they have responsibility for the safety of the people using it.” [Geetika, Senior Police Officer]</i></p> <p><b>2. Conduct risk assessments that focus on harms to women and girls, for example by engaging with survivors and victims and conducting user surveys.</b></p> <p>The need to involve adult women with lived experience of online harm was recognised as being hugely important by participants in my research. It was felt very strongly that it was only by involving those who had experienced online abuse and harm would policies designed to tackle the issue be successful. Furthermore, placing an emphasis on listening to the voices of women impacted by online abuse and harm confirms the importance of intersectionality in this area. Souad was one contributor who highlighted the need for the voices of women of colour to be central to any discussion about the improvements that should be made to online platforms:</p> <p><b><i>“Black Lives Matter, Black Twitter, Feminist Twitter are huge communities for online platforms, yet they are constantly being marginalised or forgotten about when it comes to product changes, or when it comes to new things that you can do on the platform. They’re not thinking about how it might affect or impact those communities or giving them greater control to have agency on the platform.” [Souad, Academic]</i></b></p> <p><b><i>“I feel like this is a problem on a par with raising awareness about rape and domestic violence... it requires a huge societal change and it’s very hard to envision how we’re going to get there, but I do think consciousness raising about it is really important.” [Jacqueline, Academic]</i></b></p> <p><b><i>“It’s really hard to hold the technology companies solely responsible. Do they have a role? Absolutely. But I want us to be talking to men, that this behaviour is out of bounds and it’s on all of us to intervene in that behaviour wherever they do it.” [Sue, Academic]</i></b></p>

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	<p data-bbox="699 327 1369 472"><b>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.</b></p> <p data-bbox="699 501 1390 920">The lack of reported data in this area is hugely problematic. Moving forwards, data should be collected from a wide range of sources, including schools and universities, public sector employers, the police, charities and government agencies, as well as tech companies. For it is only by synthesizing data from a range of sources will it be possible for the true picture of the online harm experienced by women (and girls) be fully appreciated. Furthermore, providing this data should be a statutory duty placed upon tech companies, and not something that is a wholly voluntary activity.</p> <p data-bbox="699 1003 1361 1149"><b>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.</b></p> <p data-bbox="699 1178 1385 1597">I am concerned that the scale of the problem affecting adult women has not been adequately recognised within the Online Safety Act (2023), and that initiatives such as abusability evaluations do very little to address many of the issues that are discussed in the consultation document. There is a noticeable gap in the expectation that social media companies should be compelled to take a greater responsibility for the acts of violence, aggression and intimidation that take place on their platforms, or an obligation on them to provide innovative solutions to overcoming such activity, using technical means where appropriate.</p> <p data-bbox="699 1608 1377 2027">At an organisational level, participants in my research articulated the view that (public sphere) employers (e.g. universities, media organisations, criminal justice agencies and political parties), should provide a greater level of training and support for their employees. Women should feel that they have a guarantee of protection from their employer when faced with abuse arising as a consequence of undertaking their employment. This should include employers taking on the responsibility for reporting online abuse to tech companies, Ofcom or law enforcement, where required. This change to occupational culture should come from</p>

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	<p>the top, with organisational leaders and senior managers made clearly aware of the pernicious consequences of online abuse upon all staff, whatever their role or level of seniority. Members of public facing occupations who engage in online abuse should have their membership of the organisation scrutinised, with the possibility of removal, if appropriate.</p> <p>At an individual level, both women and men should be provided with training in digital literacy, strongly underpinned by the principle that engaging in online abuse is never acceptable. This training should continue through into the continuous professional development schemes that all public sphere employees undertake, in order to ensure that women are able to maintain up-to-date skills in reporting and protecting themselves from being targeted online; whilst also providing men with the tools they need to act as effective allies against abuse.</p> <p><b>5. Set safer defaults, for example by ‘bundling’ default settings together to make it easier for women experiencing pile-ons to secure their accounts.</b></p> <p>THIS IS AN EXCELLENT SUGGESTION! Making reporting simpler will encourage women to report their abuse more often. However, for this to be effective, there must be widespread publicity and training (as discussed above) to raise awareness of the reporting opportunities available, along with training on how such mechanisms work. However, in order to gain public confidence, there must be proof that tech companies are acting swiftly and firmly to remove instances of abuse, and banning those who disseminate abusive and harmful content from using their platforms. Implementing a reporting mechanism that operates without applying sanctions on perpetrators of harmful content will ultimately be futile.</p> <p><b>6. Reduce the circulation of online gender-based harm, for example by using hash matching to detect and remove intimate images shared without consent.</b></p> <p>Whilst hash matching on abusive images presents a useful way of reducing the circulation of abusive and non-consensual images, it cannot be the only tool used in this area. The ability to use generative AI to alter and create images is not adequately dealt with by hash</p>

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	<p>matching alone. Combining the use of “deep tagging” with hash matching may offer an alternative solution, as the deep tag method embeds messages into images, which can be recovered even after deep fake transformations. This may prove more effective in tracking and blocking fake images. Nevertheless, whilst these methods are promising, they need to be part of a broader strategy that includes advanced detection algorithms and proactive defence mechanisms. This <b>MUST</b> be funded by the tech companies, possibly as a condition of being to operate in the UK.</p> <p><b>7. Give users better control over their experiences, for example by providing the option to block multiple accounts at once.</b></p> <p>Along with simpler reporting mechanisms (outlined in Proposal 5), giving users of online platforms the ability to block multiple abusive accounts at once would be a very positive development. However, in order to be successful (and credible), there is an onus on tech companies to make their blocking functions robust. This may not be as obvious as it sounds. In October 2024, X (formerly Twitter) changed their blocking function to allow blocked accounts to see a user's public profile and posts. Whilst this change still prevents previously blocked users from interacting with the content, it does allow them to observe what an individual may be doing at any given time. Many commentators have emphasised that the block button is often the first recourse in situations of mass doxxing or online verbal abuse, like death threats, spurred by a viral post or controversy. This new blocking tool makes being online even more difficult for those who are required to maintain a public profile on X as part of their job.</p> <p><b>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.</b></p> <p>Increasing awareness of the reporting mechanisms available to those subjected to online abuse and online harms is crucial. This was succinctly summed up by one of the contributors to my research:</p> <p><b><i>“We need to make people aware of the options available to them when it comes to reporting accounts.</i>”</b></p>

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	<p><i>Making them aware of cases where those reports have been successful as well, because I know a lot of my colleagues have received abuse, and I've said, oh, well report it to Twitter, report it to Facebook or whatever, and a lot of them have said, what's the point, nothing ever happens. And then I'll say to them, well I managed to get this account removed and this one removed, and this. And I've found that they're a bit more willing to hit that report button. So, part of it is making people aware that those options are there."</i> [Simone, Member of Parliament]</p> <p>But the ease of reporting needs to equally matched by knowledge and acceptance of the dangers of online harms from all parts of the criminal justice system. Currently, the response of law enforcement to reports of online space and online harms is patchy at best:</p> <p><i>"Every woman I know, who's tried to report to the police has found that it was a complete fiasco, and the police didn't understand, they told her to turn off her computer, and that's ridiculous, because if people are coming after you, turning off your computer's not going to stop them. Law enforcement should do more, because if law enforcement took these threats more seriously, I think that would have a chilling effect on men doing these things, if there were some more men arrested and put in jail for these kinds of things."</i> [Tiprat, Academic]</p> <p>Moving forwards, there must be proper handling of episodes of online harm by individual police forces.</p> <p><b>9. Take appropriate action when online gender-based harm occurs, for example by taking action against users who repeatedly violate the service's policies.</b></p> <p>Part of the action called for by my research is an end to anonymity by users of online platforms. Many of my research participants were disturbed by the continued availability of anonymous accounts on X. Evidence presented here echoes the work of Tromble and Koole (2020), which found that the vast majority of tweets from anonymous accounts sent to politicians in the UK, US and the Netherlands were negative and abusive, and often contained racist and / or sexist epithets.</p>

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	<p>Consequently, they concurred with the work of Ooi et al. (2021), believing that prohibiting anonymous accounts on the platform would be a relatively simple measure for social media organisations to implement, and one which would ameliorate the most extreme forms of online abuse:</p> <p><b><i>“The difficulty with identity, and people not having to prove their identity when they register an account on social media, is that these people [engaging in online abuse] could be anybody. It could be your next-door neighbour, it could be somebody physically close to you, and that’s when the risks come. You don’t actually know who these people are. It’s the responsibility of those running social media to take a more proactive approach to protecting people.”</i></b> [Geetika, Senior Police Officer]</p> <p><b><i>“Social media companies should have a set of principles, that I should be able consult, if I suffer abuse. An easy contactable line of complaint or an issued formula that investigates it. I also think that people who do abuse others, shouldn’t be allowed to be anonymous.”</i></b> [Sherrie, Member of the Northern Ireland Legislative Assembly]</p> <p><b><i>“There’s a lot of people hiding behind mirrors, feeling able to hurl abuse, knowing that they will never be identified. I think people on Twitter get away with so much, because they’re anonymised. People are just completely anonymous, so you could be talking to somebody in America about something in [name of city], and it’s not relevant to them, but they just happen to be racist, and they just want to comment on what you’ve got to say. I think the anonymisation of individuals should be banned, because it becomes impossible for the police or anybody else to do anything about it.”</i></b> [Smita, Local Councillor]</p>
<p><b>Question 3:</b> 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</p>	<p>In addition to practical change emanating from tech companies, participants in my research highlighted the need for a wider cultural reorientation of the public sphere. Political communication needs to become more temperate, in order to avoid adding to an already febrile atmosphere which works to silence a genuine multiplicity of voices and opinions:</p>

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<p>we should consider? Please provide evidence to support your comment.</p>	<p><b><i>“You need to go back and look at how you share power. How do you have more deliberative processes for people to feel like they have agency in decisions that are made about their lives? How do you get politicians themselves to behave better? The language that they use almost creates the environment where people can be bolder in their own choice of words... you’ve almost got to reteach the politicians the art of persuasion. How they need to behave differently if they want more people to buy into their beliefs. This has been coming for a long time, it’s just been expediated by events such as the economic crash, the referendums, and an explosion in productive technology like social media, all of these things have created the climate that we’re in so there’s not one easy fix.”</i></b> [Julia, Politician in Scotland]</p>
<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>There is no doubt that the tech companies being addressed in this consultation document need to be involved in designing the solutions to the problem of online abuse and harm. However, it is my opinion (and was echoed in my research) that this needs to be executed in such a way that regulation does more than simply “encourage” tech firms to follow the published guidance. Furthermore, there needs to be greater involvement of the users of online platforms in designing the proposed solutions, making them an integral part of the stakeholder group that is determining WHAT tech firms should be doing to keep women safe:</p> <p><b><i>“We need to get those who wield power and have responsibility for these platforms, as well as the legal system, to catch up with the twenty first century and put protections in place that’ll make things better for women now and the generations coming after. There is a whole swathe of legislative reform that needs to happen because the laws that we have – that may well have been written a couple of hundred years ago – aren’t equipped to deal with the twenty first century digital age. Those laws need to be updated and the involvement of women and minority groups who are disproportionately on the receiving end of abuse, have to be a part of that process. They have to be a part of the process that’s designing digital citizenship programming and education, the elements needed to help determine how it is rolled out, they need to be part of whatever task force set up to examine how our legislative structures and processes and natural laws need to evolve to mitigate this stuff.”</i></b></p> <p>[Maya, Politician in England]</p>

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<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>The impact assessments as currently proposed should mark the start of a detailed process of assessing, publicising and preventing online harms. If anything, and as shown in the evidence I have provided in response to the four questions above, there needs to be real pressure applied to the tech companies responsible for the various platforms upon which abuse occurs, to devise solutions to tackle the issue.</p> <p><i>“The platform creators must have the antidote. Nobody else can work at the scale that they can. The issue is that their business model is based on making money out of hate. They are only now just saying ‘we need help, we didn’t realise it was so bad’. It’s just crap. Just rubbish. Activists have been at this for a decade already, and they have been knocking on those doors and they have gone to San Francisco, and they have had those conversations and they’ve been literally swatted away and abused and discredited. But now their business model is being hit by the bad publicity, as actually women are a very big market. That is now causing them to take it much more seriously, and to try and engage with civil society.”</i> [Helen, Academic]</p> <p><i>We need to be shining a spotlight on the fact that this is not acceptable. Facebook are not doing a good enough job. I think there should be a Facebook moderator that pops up saying, ‘are you sure you want to post this?’ or something like, ‘would you like it if someone said this about you?’ Something really like whoa, to make your stop in your tracks..”</i> [Jill, Member of Parliament]</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</p>	<p>I do not have a view on this issue.</p>

**WARNING: This consultation response contains language and/or material that may be distressing**

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