



Our mission is to provide frictionless, trustworthy solutions for online platforms to maintain their integrity, protect their reputation and safeguard their users.

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? Y/N</p> <p>We recognise the importance of providing clarity to services in scope on how to identify and address online content and activity that disproportionately affects women and girls. Ofcom's focus on four types of harm—online misogyny, pile-ons and harassment, online domestic abuse, and image-based sexual abuse—brings much-needed structure to a broad and complex area.</p> <p>We would like to share the following observations:</p> <ul style="list-style-type: none">- It is important to emphasise that intimate image abuse is not only harmful but also illegal under UK law. This includes non-consensual sharing of intimate images, threats to share, and increasingly, synthetic content such as deepfakes. The guidance could be



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	<p>strengthened by more clearly stating the illegality of these behaviours and setting out expectations for swift removal and escalation. Tools such as consent verification and consent management can play a critical role in proactively preventing the circulation of non-consensual content, particularly on platforms hosting user-generated explicit material.</p> <ul style="list-style-type: none"> - From our perspective as a safety tech provider, it is also essential that services consider both illegal and legal-but-harmful content when assessing risks. Image-based abuse, for example, often sits at the intersection of blurred consent boundaries and emerging technologies. Services would benefit from clear, practical guidance on how to respond proportionately and effectively, with options to deploy technologies such as content moderation and participant consent verification. - The approach would also benefit from further consideration of how risks are assessed dynamically, particularly in fast-evolving areas, and how providers of varying sizes and risk profiles can implement the guidance proportionately. - More broadly, we encourage an approach that balances strategic ambition with operational feasibility. Platforms need clarity not just on expected outcomes, but also on realistic implementation pathways. We welcome the opportunity to contribute to this consultation and support efforts to strengthen practical protections for users across different types of online harms.
<p>Question 2: Do you have any comments on the nine proposed actions? Please provide evidence to support your answer.</p>	<p>Confidential? Y/N</p> <p>As a safety tech provider working with a wide range of online platforms across various sectors including social media, online video gaming, ecommerce and adult entertainment, Verifymy welcomes the structured approach outlined in the nine proposed actions. We support the ambition to move beyond basic compliance and encourage services to take a more preventative and design-led approach to user safety. That said, we would like to offer the following observations:</p> <p>1. Scope and Clarity of Expectations</p> <p>The actions are broad and high-level, which allows for flexibility but may limit effectiveness if services are unclear about what implementation looks like in practice. For example action 6 (Reduce the circulation of gender-based harm) lists promising interventions such as hash matching and consent verification, but these are not universally understood or implemented. Further detail on what constitutes “effective” implementation—particularly for image-based abuse—would be helpful.</p> <p>2. Evidence and Practice from Our Work</p> <p>Participant consent & verification: In our work supporting adult platforms and content-hosting services, we've seen that requiring consent prior to uploading explicit content is increasingly recognised as an effective way to reduce the risk of non-consensual image and video sharing. Consent logs can support platforms in resolving disputes more efficiently and reducing takedown turnaround times. Our technology also helps detect whether all participants identified in a video have given consent (through face matching), and can play a role in mitigating the risk of deepfakes and other forms of abusive content being uploaded.</p>



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	<p>Age Assurance: Age assurance solutions can help services identify underage users before they are exposed to harmful content. We have seen this applied effectively on platforms that allow user-generated video content, where grooming and sexual exploitation risks could manifest.</p> <p>Content moderation: Our technology includes automated detection and moderation tools tailored to illegal content, such as CSAM. Platforms integrating these tools typically report faster response times and improved detection effectiveness, supporting compliance with illegal content duties and reducing exposure for vulnerable users.</p> <p>These examples demonstrate that some of the proposed actions are already feasible and in use, particularly when supported by external tools developed by experts. They need not be aspirational or burdensome.</p> <p>3. Monitoring and Adaptation</p> <p>We suggest that Ofcom build in mechanisms to evaluate the uptake and effectiveness of these nine actions over time. Some actions may lend themselves to future codes of practice, should voluntary adoption prove inconsistent.</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? Y/N</p> <p>We welcome the inclusion of good practice steps and illustrative case studies in the draft guidance. These provide useful direction to services, particularly where there is operational ambiguity or limited in-house safety expertise. However, we would like to offer the following reflections on their effectiveness, applicability, and potential risks:</p> <p>1. Effectiveness and Clarity</p> <p>The good practice steps outlined in the guidance cover many promising areas, including safer onboarding, content moderation workflows, and the prevention of intimate image abuse. We particularly welcome the reference to techniques such as hash matching, consent nudging, and consent verification in the case study on pornographic services. These are tangible, currently available interventions that can significantly reduce non-consensual content circulation when implemented well.</p> <p>However, the guidance could benefit from:</p> <ul style="list-style-type: none"> - More detail on what ‘good’ looks like in implementation terms - Guidance on how to assess effectiveness, such as impact metrics, survivor feedback, or response time benchmarks <p>2. Risks of Inconsistent Interpretation or Uptake</p> <p>While the good practice framing offers flexibility, it also creates a risk of uneven uptake across the regulated ecosystem—particularly where services may be unsure how or whether they are expected to act. Some may view these steps as aspirational rather than necessary.</p> <p>To address this, we would suggest:</p> <ul style="list-style-type: none"> - Clearly distinguishing between "emerging" practices and those that are already in use and demonstrably effective (e.g. participant consent verification, age assurance at onboarding). - Encouraging services to explain where they deviate from good practice and why, creating a more accountable approach to optional guidance.



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	<p>3. Additional Good Practice Examples</p> <p>The good practice steps and case studies are a useful starting point. Their effectiveness would be enhanced by greater clarity on expected outcomes, support for proportionate implementation, and recognition of third-party technologies that can enable services to act quickly and responsibly. We would be pleased to work with Ofcom or other stakeholders to support the development of more case studies or more detailed implementation examples.</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? Y/N</p> <p>We recognise the challenge Ofcom faces in driving meaningful uptake of non-mandatory guidance. The proposal to publish an assessment of how providers are addressing women and girls’ safety is a sensible step. It could offer a level of public accountability without requiring legislative changes, and encourage more consistent adoption of good practice over time.</p> <p>We offer the following suggestions for how this approach could be strengthened:</p> <p>1. Transparency with Purpose</p> <p>If Ofcom proceeds with publishing assessments, it would be helpful to:</p> <ul style="list-style-type: none"> - Clearly outline the criteria and process for how providers will be assessed. - Include both positive examples of progress and areas for improvement. - Allow providers the opportunity to explain their approach, particularly where they use alternative but effective safety measures. <p>This could create a more constructive form of accountability and avoid unhelpful comparisons between services with very different risk profiles or capacities.</p> <p>2. Recognising Innovation and External Tools</p> <p>There is an opportunity to encourage greater adoption of good practice by:</p> <ul style="list-style-type: none"> - Highlighting services that implement innovative solutions, including partnerships with safety tech providers. - Recognising the role of external tools that can support implementation—especially for smaller or resource-constrained platforms. <p>This could help shift perception from “<i>compliance exercise</i>” to “<i>safety innovation showcase.</i>”</p> <p>3. More Guidance on Proportionality</p> <p>Providers may be more likely to take up good practice if they understand:</p> <ul style="list-style-type: none"> - How expectations scale depending on service type, size, and risk. - What “doing enough” might look like at different levels of resourcing. <p>This could be supported by illustrative risk tier models or examples by sector (e.g. adult, livestreaming, UGC platforms).</p> <p>4. Other Ways to Encourage Uptake</p> <p>In addition to assessments, Ofcom could also consider:</p> <ul style="list-style-type: none"> - Creating a voluntary recognition scheme or kite mark for services that adopt certain good practices.



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	<ul style="list-style-type: none"> - Facilitating sector-specific working groups or workshops to support practical implementation. - Publishing an annual state of women and girls' online safety report, tracking progress across the sector. <p>We also note that the current timeline—final guidance by the end of the year and a progress report 18 months later—may be too slow given how rapidly some of the harms, such as AI-generated abuse and cross-platform targeting, are evolving. To maintain momentum and public accountability, we suggest Ofcom consider interim check-ins or thematic updates at six-month intervals. These could provide early visibility into areas of progress or challenge and help surface examples of emerging practice before the formal assessment stage.</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? Y/N</p> <p>We note that Ofcom's impact, rights, and equality assessments reflect the need to balance safety, freedom of expression, and data protection.</p> <p>As a provider of privacy-focused safety tech solutions, we welcome Ofcom's focus on privacy-by-design approaches. We believe that effective safety measures and strong privacy safeguards are not mutually exclusive—and that future guidance should highlight examples of privacy-preserving safety innovation.</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>N/A</p>



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