



# Consultation response form

## Your response

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>While the draft guidance covers a welcome approach in recognising online harms, some points that can be additionally focused on more include:</p> <ol style="list-style-type: none"><li><b>1. AI-Generated Deepfakes (under section like Image based abuse):</b> While the guidance covers image-based abuse, it does not directly address the rise of deepfake pornography, most which targets women. Research by Deeptace, found that 96% of deepfake videos online are non-consensual sexual/pornographic content involving women. <sup>1</sup>These tools are widely available and are increasingly used to harass women, including girls as young as 14.<sup>2</sup></li><li><b>2. Rise of the Manosphere Influencers:</b> The guidance does not include mention misogynistic subcultures thriving on online platforms (e.g., the "manosphere", incels and "red pill") influencers like Andrew Tate, Adin Ross, Sneako and Jordan Peterson among others. These spaces led by these influencers normalise violence against women under the guise of self-improvement or lifestyle advice. Surveys show one in three young men admire Andrew Tate, whose ideology promotes rape myths and control in relationships<sup>3</sup>. Exposure to this content correlates with increased acceptance of violence against women.</li></ol>

<sup>1</sup> Ajder, H., Patrini, G., Cavalli, F., Cullen, L., & Deeptace. (2019). The State of Deepfakes: landscape, threats, and impact. In *Deeptace* [Report]. [https://regmedia.co.uk/2019/10/08/deepfake\\_report.pdf](https://regmedia.co.uk/2019/10/08/deepfake_report.pdf)

<sup>2</sup> Hawkins, W., Russell, C., & Mittelstadt, B. (2025, May 6). *Deepfakes on Demand: the rise of accessible non-consensual deepfake image generators*. arXiv.org. <https://arxiv.org/abs/2505.03859>

<sup>3</sup> Savanta. (2023, June 12). *One in three young males have a positive view of Andrew Tate - Savanta*. Savanta - Savanta. <https://savanta.com/knowledge-centre/view/1-in-3-have-a-positive-view-of-andrew-tate/>

Question	Your response
	<p><b>3. 3. Algorithmic Amplification of Misogyny:</b> Platforms should be required to audit and adjust algorithms that promote gender-based hate. Research has shown that recommender algorithms often steer users towards extreme content, including violent misogyny, creating echo chambers that radicalise users. For example, researchers observed TikTok’s algorithm quadrupling the amount of violent, blame-filled videos about women in just days.<sup>4</sup> If algorithms are biased, they may unknowingly (or carelessly) flood women’s feeds with threats and hate, worsening abuse and normalising violence. And while this content reaches women, this algorithm also floods men’s feeds, fuelling misogynistic culture further.<sup>5</sup></p> <p><b>4. Internet of Things and Device-Enabled Stalking:</b> The guidance does not account for abuse using smart home devices (e.g. speakers, locks, trackers). Abusers exploit these to monitor, control, and harass women in their own homes. Clear guidance must be included for technology manufacturers and platforms to mitigate IoT-related harms. For instance, Jodi Leedham from Refuge, has highlighted cases where abusers remotely controlled home heating systems to taunt victims or played disturbing sounds through smart speakers during the night. Such actions are designed to instil fear and assert control over the victim's environment<sup>6</sup>. Ofcom’s guidance should explicitly cover smart devices. Tech companies and device-makers should be urged to build safety by design: for example, enabling easy reset/disabling of trackers, stricter pairing requirements (so strangers can’t connect), and security defaults (like notifying users of new Bluetooth</p>

<sup>4</sup> Weale, S. (2024, February 6). Social media algorithms ‘amplifying misogynistic content.’ *The Guardian*. [https://www.theguardian.com/media/2024/feb/06/social-media-algorithms-amplifying-misogynistic-content?CMP=share\\_btn\\_url](https://www.theguardian.com/media/2024/feb/06/social-media-algorithms-amplifying-misogynistic-content?CMP=share_btn_url)

<sup>5</sup> Hacker, C. (2025, April 2). *Addressing Gender Norms: Accelerating Women’s Safety in the age of AI - Tech For Good Institute*. Tech for Good Institute. <https://techforgoodinstitute.org/blog/articles/addressing-gender-norms-accelerating-womens-safety-in-the-age-of-ai/#:~:text=AI,the%20challenges%20of%20online%20safety>

<sup>6</sup> Oppenheim, M. (2024, December 5). Expert reveals how abusers utilise smart home tech to terrorise victims, from speakers to children’s toys. *The Independent*. <https://www.independent.co.uk/news/uk/home-news/smart-home-tech-domestic-abuse-victims-b2659309.html>

Question	Your response
	<p>trackers). Guidance should ask platforms to support victims' requests to block location-sharing or disable unknown devices. Survivors' services also need advice on securing all "smart" parts of the home. In short, add clear rules on preventing and detecting device-based stalking. All tracking and monitoring applications should include default settings to switch off to ensure users actively are able to consent to tracking when they wish to be tracked, rather than failing to opt out of surveillance.</p> <p><b>5. Data Harvesting and Doxing:</b> The guidance can also acknowledge and address the use of automated scraping tools and the posting of personal information (doxing), which often precedes stalking and harassment. These acts disproportionately affect women, especially those in public roles. Platforms should be required to lock down user data and crack down on automated scraping. For example, they could enforce stricter limits on how quickly pages are accessed, ban bots that collect profiles, and ban services that trade personal info. The guidance should also recommend swift removal of doxing content and provide clear reporting routes. Companies must actively remove lists of private information (addresses, phone numbers) posted maliciously. In short, require companies to treat doxing as a serious abuse case: notify victims, support legal removal, and ensure perpetrators, both individual and institutional are held to account for their actions or failure to act.<sup>7</sup></p> <p><b>6. Closed Platforms:</b> Encrypted apps like Telegram, Signal and Discord host abuse. These must also be included within the guidance. The guidance focuses largely on mainstream social networks and apps but does not focus much on encrypted or closed platforms where women also face abuse. Harassing content can simply migrate to private channels beyond easy moderation. For example, a 2025 Wired investigation found networks of men on Telegram taking private Facebook photos from women's groups and sharing</p>

<sup>7</sup> Equality Now. (2024, October 29). *Lack of legal protections against doxing is putting women at greater risk of online stalking and harassment* - Equality Now. [https://equalitynow.org/press\\_release/lack-of-legal-protections-against-doxing-is-putting-women-at-greater-risk-of-online-stalking-and-harassment/#:~:text=Doxing%20is%20a%20women%E2%80%99s%20rights,issue](https://equalitynow.org/press_release/lack-of-legal-protections-against-doxing-is-putting-women-at-greater-risk-of-online-stalking-and-harassment/#:~:text=Doxing%20is%20a%20women%E2%80%99s%20rights,issue)

Question	Your response
	<p>them to dox and circulate non-consensual intimate images. Because these channels are private or encrypted, abusive material can spread unchecked and anonymously. If guidance doesn't highlight closed platforms, it lets abusers evade enforcement, meaning women are unsafe even if mainstream sites improve. <sup>8</sup>Ofcom should explicitly include encrypted and private messaging services in safety requirements. This could mean requiring even small or invite-only platforms to deploy moderation tools, respond to abuse reports, and assist police. For instance, Telegram or Discord could be asked to scan public channel content for harassment patterns or to provide user identities to authorities in criminal cases. At minimum, guidance must make clear that all online services used by women must address abuse, and support reporting on closed platforms as well as open ones.<sup>9</sup></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>Question 2: Comments on the nine proposed actions</b></p> <p>The nine proposed actions are welcomed, but several can be strengthened further:</p> <ol style="list-style-type: none"> <li>1. <b>Action 1 &amp; 2 (Governance and Risk Assessment)</b> should require survivor involvement in risk assessment processes. Including survivor perspectives ensuring that threat modelling considers real-life tactics used by abusers.</li> <li>2. <b>Action 3 (Transparency Reporting)</b> lacks specific metrics. KPIs can be utilised to map and measure time to handle dealing with abuse takedown from platforms (eg, 80% of gender-based abuse reports resolved within 48 hours). Guidance can further set quantitative</li> </ol>

<sup>8</sup> Wolfe, A., & Cammarata, S. (2025, February 24). Inside the Telegram groups doxing women for their Facebook posts. *WIRED*. <https://www.wired.com/story/inside-the-telegram-groups-doxing-women-for-their-facebook-posts/#:~:text=In%20late%20January%2C%20a%20warning,Their%20justification%3F%20Retaliation>

<sup>9</sup> *Online Safety Act: explainer*. (2025, April 24). GOV.UK. <https://www.gov.uk/government/publications/online-safety-act-explainer/online-safety-act-explainer#:~:text=safety%2Dact%2Dexplainer-,What%20does%20the%20Online%20Safety%20Act%20do?,content%20they%20want%20to%20see.>

Question	Your response
	<p>standards for response. For example, platforms should be required to acknowledge reports within hours and resolve straightforward harassment cases within a fixed time (e.g. 24–48 hours). Ofcom could demand that companies publish performance metrics (how many reports closed in a week, median response time, etc.). The draft should also emphasise clarity and communication about how victims must be informed of actions taken. In practice, tech firms should be measured by SLAs (service level agreements) for content takedown and user support. Having such targets will drive platforms to staff their Trust &amp; Safety teams adequately and streamline processes. By having KPI's set by Ofcom there would be consistency of measurement across different platforms, reducing likelihood of individual companies manipulating the reporting of data to hide poor performance.</p> <ol style="list-style-type: none"> <li data-bbox="794 1115 1362 1339">3. <b>Action 5 (Safer Defaults)</b> should be evidence-led. Support Ofcom's focus on bundling. Bundled privacy defaults and one-click blocks reduce harassment significantly. These should be standard rather than optional.</li> <li data-bbox="794 1361 1362 1473">4. <b>Action 6 (Hash-matching)</b> should be expanded to include synthetic media and deepfakes.</li> <li data-bbox="794 1496 1362 1809">5. <b>Action 9 (Enforcement)</b> should require platforms to deplatform repeat offenders and share ban lists across services to prevent serial abusers from re-registering. For example, in dating platforms despite there being ban processes in place, repeat offenders can log back into the platform with a new account.</li> </ol>
<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</p>	<p>Confidential? –N</p>

Question	Your response
<p>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>We welcome the case studies as they are informative and cover several areas, some additional recommendations include:</p> <ol style="list-style-type: none"> <li data-bbox="794 405 1382 1458"> <p><b>1. Survivor Design Labs:</b> Platforms should invest in permanent survivor design labs to co-create safety tools. While Ofcom says it incorporated insights from survivors when drafting its guidance, it stops short of asking that providers establish survivor advisory boards or governance roles. There is no firm rule that those with lived experience must help shape policies. Both Meta and Bumble have implemented survivor-led design initiatives to enhance safety for women on their platforms. This should be an industry standard. In 2021, Meta launched its Women’s Safety Hub and established a team of Global Women’s Safety Expert Advisors. This group comprises 12 nonprofit leaders, activists, and academic experts specializing in online abuse, gender-based violence, and digital rights. Their role is to guide Meta in developing policies, products, and programs that better support women using its platforms. Bumble has partnered with Chayn, a survivor-led nonprofit, to integrate trauma-informed <sup>10</sup>support directly into its platform. This collaboration introduced Bloom, an online trauma support service for survivors of sexual abuse or assault.<sup>11</sup></p> </li> <li data-bbox="794 1480 1382 1787"> <p><b>2. Deplatforming Repeat Offenders:</b> Proven to reduce harm. In 2015, Reddit took decisive action by banning several subreddits, notably r/fatpeoplehate and r/CoonTown, due to violations of its anti-harassment policies. These communities were known for targeting individuals with hate speech and harassment. A study titled "You Can't Stay Here:</p> </li> </ol>

<sup>10</sup> Safety, C. S. H. O. W. (2021, June 30). Partnering With Experts to Promote Women’s Safety. *Meta Newsroom*. <https://about.fb.com/news/2021/06/partnering-with-experts-to-promote-womens-safety/>

<sup>11</sup> Naidoo, N. A. (2022, January 6). We’re partnering with Bumble to bring Bloom to their users. *Medium*. <https://blog.chayn.co/were-partnering-with-bumble-to-bring-bloom-to-their-users-97128ce28e7f>

Question	Your response
	<p>The Efficacy of Reddit's 2015 Ban Examined Through Hate Speech" analysed the impact of these bans. The research found that the bans led to a significant reduction in hate speech among users who remained on the platform. Specifically, users who were active in the banned subreddits either left Reddit or dramatically reduced their use of hate speech. Moreover, the study observed that the bans did not lead to an increase in hate speech in other parts of Reddit, indicating that the deplatforming was effective in curbing harmful behaviour without displacing it elsewhere on the site. <sup>12</sup> Other examples also Andrew Tate being banned across some major platforms. <sup>13</sup>This must be encouraged across the industry without exception, especially for high-risk repeat harassers.</p> <p><b>3. Third-Party Support Integration:</b> Platforms should offer direct links to helplines such as Live Fear Free or Rape Crisis. A good practice example is by Rockstar Games (the creators for Grand Theft Auto) who have included collaborations with Hotline service organisations on their "Resources" page, and this includes for Sexual Harassment and Child Endangerment among others. <sup>14</sup></p> <p><b>4. Algorithmic Fairness Audits:</b> Conduct annual independent audits to detect biases and ensure fair treatment across genders and racial backgrounds. Tech platforms should require annual independent audits of online services' safety systems for women. This could include checks of how algorithms treat gendered content, effectiveness of hate-speech</p>

<sup>12</sup> Chandrasekharan, E., Pavalanathan, U., Srinivasan, A., Glynn, A., Eisenstein, J., & Gilbert, E. (2017). You can't stay here. *Proceedings of the ACM on Human-Computer Interaction*, 1(CSCW), 1–22. <https://doi.org/10.1145/3134666>

<sup>13</sup> Miranda, S. (2022, August 20). Andrew Tate gets banned from Facebook, Instagram, TikTok for violating their policies. *NPR*. <https://www.npr.org/2022/08/20/1118624860/andrew-tate-facebook-instagram-banned>

<sup>14</sup> Games, Rockstar. (n.d.). *Resources - Rockstar Games*. Rockstar Games. <https://www.rockstar-games.com/community-guidelines/resources>

Question	Your response
	<p>detection, and accuracy of moderation decisions. The audit results (at least summaries) should be made public. This transparency would pressure companies to remedy issues. For example, as research from Harvard notes, publicly disclosed platform audits force firms to address harms they might otherwise ignore.<sup>15</sup></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>Confidential? – N</p> <p>Completely support Ofcom’s work with publishing assessments, but additional recommendations can include:</p> <ul style="list-style-type: none"> <li>• Include clear, comparative safety metrics.</li> <li>• Be disaggregated by gender, language (Welsh/English), region and country.</li> <li>• Include user satisfaction surveys with survivors.</li> </ul> <p><b>Additional recommendations:</b> a ‘kitemark’ scheme to identify safe platforms. A visible certification (or “kitemark”) awarded by a trusted authority to online services that meet robust gender-safety standards. Think of it like the BSI Kitemark for child-online safety but focused on protections against violence and harassment of women and girls. The British Standards Institution’s <i>Kitemark for Child Safety Online Software</i> was developed jointly with Ofcom, the Home Office and industry bodies. Products carrying this kitemark must demonstrate best-practice privacy controls, age-appropriate default settings and clear reporting mechanisms<sup>16</sup>. Can develop a “Women’s Online Safety Kitemark” under a consortium including BSI, Ofcom and the VAWDASV sector.</p>

<sup>15</sup> Costello, N., Almassian, M., Sutton, R., Jones, M., Diamond, S., Ojumu, O., Raffoul, A., Salvia, M., Kavanaugh, J. R., & Austin, S. B. (2024). How to hold social media platforms accountable: A roadmap for state policymakers & advocates for legislation to require independent algorithm risk audits. In *Strategic Training Initiative for the Prevention of Eating Disorders*. <https://www.hsph.harvard.edu/striped/wp-content/uploads/sites/1267/2024/03/Roadmap-Holding-Social-Media-Platforms-Accountable.pdf>

<sup>16</sup> *Kitemark for Child Safety online software*. (n.d.). BSI Middle East and Africa. <https://www.bsigroup.com/en-AE/Our-services/Product-certification/Industry-sector-schemes/Kitemark-for-Child-Safety-Online-Software>

Question	Your response
	<p>Certification criteria could cover default privacy settings for new accounts; one-click blocking/muting; fast takedown of harassment; survivor-informed UX for reporting; and algorithmic bias audits.</p> <p>Publicise certified platforms allowing users and advertisers to choose services that display the kitemark.</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>Studies show Black and minoritised women face both misogyny and racism online. A Glitch report found Black women experience significantly higher rates of online hate- often involving racial slurs plus gendered insults and are less likely to see such content removed.<sup>17</sup> Disabled women encounter targeted harassment that exploits stereotypes about their bodies or minds. Inquiries by the UK Parliament’s Petitions Committee note that disabled users report abuse both online and offline at high levels, yet such cases are under-reported and under-prosecuted<sup>18</sup>. Many platform interfaces (complex forms, CAPTCHAs, poor screen-reader support) hinder disabled survivors from reporting. All 43 police forces in England &amp; Wales share domestic-abuse victim data with Immigration Enforcement; this “empowers abusers”<sup>19</sup> by deterring migrant survivors from contacting authorities for fear of deportation. Modern slavery research similarly shows victims stay with exploiters rather than seek help due to immigration fears<sup>20</sup>.</p> <p>Furthermore, Among UK households earning £25k or less, 1 in 5 never use the internet; nearly one-third of people with disabilities are offline; 1 in 5 mobile users</p>

<sup>17</sup> Glitch. (2023, September 7). The Digital Misogynoir Report: Online abuse against Black women allowed and enabled to thrive. *Medium*. [https://medium.com/@glitchuk\\_/the-digital-misogynoir-report-online-abuse-against-black-women-allowed-and-enabled-to-thrive-25a1d82b82f1](https://medium.com/@glitchuk_/the-digital-misogynoir-report-online-abuse-against-black-women-allowed-and-enabled-to-thrive-25a1d82b82f1)

<sup>18</sup> Publications Parliament UK. (n.d.). *Being disabled online*. <https://publications.parliament.uk/pa/cm201719/cmselect/cmcompetitions/759/75905.htm>

<sup>19</sup> Muttock, C. (2024, April 30). *Police report victims of domestic abuse to Immigration Enforcement, ‘empowering abusers’* Domestic Abuse Commissioner. <https://domesticabusecommissioner.uk/police-report-victims-of-domestic-abuse-to-immigration-enforcement-empowering-abusers/>

<sup>20</sup> Taylor, D. (2025, May 10). Modern slavery victims opt to stay with exploiters for fear of deportation, research finds. *The Guardian*. <https://www.theguardian.com/world/2025/may/09/modern-slavery-victims-opt-to-stay-with-exploiters-for-fear-of-deportation-research-finds>

Question	Your response
	<p>regularly run out of data by month's end<sup>21</sup>. Women make up 61% of UK adults lacking basic digital skills and are more likely to be smartphone-only users, relying on shared or public devices (libraries, community centres). This becomes further of an issue in rural areas especially in North Wales.<sup>22</sup></p> <p>Support the assessments but recommend:</p> <ul style="list-style-type: none"> <li>• A deeper analysis of <b>intersectional impacts</b>, especially for women of colour, disabled, migrant, and LGBTQ+ women.</li> <li>• Protection of safety data from being shared with immigration enforcement.</li> <li>• Assessment of <b>digital poverty and device-sharing risks</b>, which impact women in low-income households.</li> </ul>
<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? – N</p> <p>Yes, if properly implemented. To ensure parity:</p> <ul style="list-style-type: none"> <li>• All tools, reporting systems, and communications must be available in Welsh.</li> <li>• Platforms should be required to collect Welsh-language usage data.</li> <li>• Welsh-speaking survivors must be engaged in design and testing of features.</li> </ul> <p>Language and access barriers leave many Welsh women unserved. Guidance must require bilingual and accessible approaches. Platforms and support services should provide Welsh-language options (helplines, apps, content) to comply with Welsh language rights. The guidance should also acknowledge digital poverty: for instance, promoting offline support (phone hotlines, community outreach) and designing low-bandwidth tools. Public spaces like libraries should be recognised partners in online safety, not ignored. Make Welsh-speakers and</p>

<sup>21</sup> Institute of Development Studies. (2023, August 15). *Digital Poverty in the UK (accessible version)* - Institute of Development Studies. <https://www.ids.ac.uk/publications/digital-poverty-in-the-uk-accessible-version/>

<sup>22</sup> Ong, A. (2021, September 1). Excluded: How women suffer from digital poverty in the UK. *Al Jazeera*. <https://www.aljazeera.com/features/2021/9/1/excluded-how-women-suffer-from-digital-poverty-in-the-uk>

Question	Your response
	<p>low-income women part of the plan. The Welsh Government’s own inclusion strategy shows training and services should be delivered in Welsh “and English” to be effective. <sup>23</sup>This guidance must ensure that it is aligned with not just Welsh language needs but also with Welsh Legislation. This includes the VAWDASV National Strategy, The Well-Being of Future Generations (Wales) Act and other devolved legislation designed to address VAWDASV.</p> <p>Ending online violence is essential to achieving gender equality. Ofcom’s draft guidance is a critical opportunity, but it must be strengthened to truly protect women and girls.</p>

Please complete this form in full and return to [OS-Section54@ofcom.org.uk](mailto:OS-Section54@ofcom.org.uk).

---

<sup>23</sup> *Digital inclusion progress report: towards a digitally confident Wales [HTML] | GOV.WALES.* (2022, March 14). GOV.WALES. <https://www.gov.wales/digital-inclusion-progress-report-towards-digitally-confident-wales-html#:~:text=The%20training%20programme%2C%20delivered%20in,role%20community%20centres%20and%20libraries>