

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

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? – N</p> <p>While Ofcom notes the potential impact of misogynistic content on men and boys, this must be developed further. Such content reinforces rigid, harmful ideas about masculinity, limits emotional expression, harms men and boys' mental health and distorts perceptions of healthy relationships. To effectively address these harms, Ofcom must ensure platforms implement a safety-by-design approach, making harmful content harder to post, easier to report and block other users seeing it more swiftly. Users should be able to add context to their reports, and moderators must be trained to identify misogynistic attitudes and behaviours shared online.</p> <p>The definition of online misogyny, provided in Annex A must be much clearer to ensure that service providers understand what constitutes online misogyny. Ofcom should update this definition, specifically acknowledging that "online misogyny is a form of gender-based cyber-hate, directed against women because they are women."¹ Ofcom should further specify that online misogyny "affects women of all backgrounds who participate actively online."² Responses to those who report online misogyny must consider the intersectionality of women and girls' experiences.</p> <p>In addition, platforms should adopt technologies that prevent users, particularly men and boys, from seeking out and engaging with misogynistic content. Preventing access is crucial to disrupting the cultures that fuel men's violence against women and girls.</p> <p>Ofcom should support men and boys who want to act as allies online. Those who speak out against misogyny are often targeted themselves. Platforms must make it easier to support women and girls online, while limiting the reach of harmful creators and content.</p> <p>Finally, successful implementation of this Guidance requires more than platform level change. Ofcom must support users, young people and adults, with campaigns,</p>

¹ Barker, K., & Jurasz, O. (2018). *Online misogyny as a hate crime*. Available here: <https://doi.org/10.4324/9780429956805>

² Ibid

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	<p>training and resources to build their digital literacy and critical analysis skills. This, alongside better moderation and platform accountability, is essential for creating a safer online environment for everyone.</p>
<p>Question 2: Do you have any comments on the nine proposed actions? Please provide evidence to support your answer.</p>	<p>Confidential? – N</p> <p>Because the good practice and foundational steps, are not mandatory, their impact is likely to be limited. Without enforceable requirements, service providers are not likely to adopt these measures, undermining the goal of creating a safer online environment.</p> <p>Action 1: Ensure governance and accountability processes address women and girls’ online safety</p> <p>Ofcom should additionally mandate service providers to take a whole organisation approach, embedding gender equality across internal policies and departments, ensuring both staff and users feel and are supported. Providers can implement a whole organisation approach through training staff internally, creating policies and procedures with gender equality at their core informed by women’s lived experiences.</p> <p>Action 2: Conduct risk assessments that focus on harms to women and girls.</p> <p>Ofcom should add an additional best practice step for service providers to conduct research into, and risk assessments on, what men and boys are viewing online and its impact. Additionally, Ofcom should encourage providers to facilitate regular attitude surveys with users to detect harmful trends early and develop proactive interventions.</p> <p>Action 3: Be transparent about women and girls safety online</p> <p>Active bystanders play a crucial role in supporting women and girls online. Ofcom should provide further guidance for service providers to better support these individuals. This includes considering and understanding the impact of harmful content they encounter and the backlash and harassment they may experience.</p>

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	<p>Additionally, Ofcom must ensure that service providers take user reports seriously. This includes through updating safeguarding policies, increasing capacity to respond to reports and ensuring that users feel supported when making reports. We also recommend that technology companies have strong response options available to them for use when reports are made and validated, so that there are consequences for those perpetrating online abuse.</p> <p>Action 4: Conduct abusability evaluations and product testing.</p> <p>Robust and ongoing abusability evaluations and product testing have the potential to tackle some forms of tech-enabled abuse. Without mandating service providers to conduct these evaluations their impact will be minimal.</p> <p>Working with experts on perpetrator behaviour is essential but must be conducted ethically with experts fairly compensated for their work. This is especially important given the funding and capacity pressures within the ending VAWG sector, highlighted within the Domestic Abuse Commissioner’s recent report.³</p> <p>Action 5: Set safer defaults.</p> <p>Unfortunately, the good practice steps highlighted within Action 5 are unlikely to be adopted due to cost and complexity.</p> <p>These steps place responsibility on individuals to keep themselves safe. A true safety-by-design approach should ensure that harmful content is prevented in the first instance. Ofcom must encourage providers to follow this approach and put the onus on their technology not to allow harmful content to be posted in the first place, and on perpetrators to not share harmful and violent content.</p> <p>Action 6: Reduce the circulation of content depicting, promoting or encouraging online gender-based harm.</p> <p>Ofcom should expand guidance on “time outs” and banning repeat offenders, including clear thresholds and</p>

³ Domestic Abuse Commissioner. (2025). *Victims in their own right? Babies, children and young people’s experience of domestic abuse*. Available here: https://domesticabusecommissioner.uk/wp-content/uploads/2025/04/dac_bcyp_main-report_FINAL-DIGITAL.pdf

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	<p>consistent enforcement across platforms. Ofcom should also add an additional action within Section 4 of the Guidance to ensure service providers are actively supporting men and boys online. This includes providing the tools that they need to be active bystanders in reporting and calling out harmful and misogynistic content online.</p> <p>Action 7: give users better control over their experiences</p> <p>More detailed guidance is needed for service providers to effectively implement user controls within Action 7.</p> <p>Ofcom should also encourage service providers to signpost resources and information specifically for men and boys to help them to understand the impact of and challenge online harms.</p> <p>Action 9: Take appropriate action when online gender based harm occurs</p> <p>Fact-checking, content labelling and watermarks, can improve online safety, but will ultimately be ineffective if left to service provider’s discretion.</p> <p>Additionally, within Action 9, Ofcom must clarify what constitutes as “enforcement action”, and what accounts to a “continued violation” of a platform’s terms of service. Further, Ofcom should encourage service providers to utilise detection technologies not just to hide, but remove harmful content in its entirety.</p> <p>Conclusion on actions</p> <p>Without making these good practice and foundational steps mandatory and providing more detailed guidance, there is a risk the measures will be inconsistently adopted or ignored altogether. Effective implementation depends on structural accountability, whole-organisation commitment, and proactive engagement with users and potential perpetrators. There must be stronger enforcement, clearer standards and support for all users, including men and boys as allies, for long-term and meaningful progress across platforms.</p>

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<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? – N</p> <p>Given the breadth of case studies in Chapters 3, 4 and 5, our response focuses on those most relevant to White Ribbon UK’s work.</p> <p>Case Study 2 - Sexualised harassment policy</p> <p>Sexualised harassment policies are significantly more effective when implemented proactively rather than reactively. Ofcom should urge service providers to embed such policies as a preventative measure, drawing on the principles and framework provided by the Worker Protection (Amendment of Equality Act 2010) Act, which emphasises prevention over retrospective action.⁴</p> <p>Case study 3 – External oversight</p> <p>Ofcom should ensure that providers consult with ending VAWG sector experts, whose understanding of women and girls’ lived experiences can inform more effective harm prevention strategies. These organisations must be engaged with ethically and appropriately compensated for their time and expertise.</p> <p>Case Study 5 – Trauma-informed user surveys</p> <p>Ofcom should encourage similar surveys targeted at men and boys to better understand their online experiences, particularly regarding exposure to harmful content and its influence on them. This broader perspective is critical in understanding the full scope of online abuse and working to prevent harm from happening in the first instance.</p> <p>Action 3 – Additional case study</p> <p>Action 3 lacks an associated case study, Ofcom should address this by including one demonstrating how platforms can protect and empower users who challenge misogynistic content.</p> <p>Ofcom’s case studies provide some valuable insights, but their impact will remain limited unless service providers are required to implement the good practice steps. Mandating providers to implement these steps, rather than</p>

⁴Office for Equality and Opportunity. (26th October 2024). New protections from sexual harassment come into force. GOV.UK. Available here: <https://www.gov.uk/government/news/new-protections-from-sexual-harassment-come-into-force> [Accessed 12/05/2025]

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	<p>relying on voluntary uptake, is essential in driving sector-wide change and ensuring online spaces are safe for all users.</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? – N</p> <p>To strengthen the Guidance, Ofcom could consider including a dedicated section explaining the importance and value of implementing these recommendations. In addition to the moral imperative to protect women and girls online, there are substantial reputational risks for providers that fail to act. Framing the adoption of these practices as an opportunity for providers to demonstrate leadership and set sector-wide standards may serve as an effective motivator. Moreover, platforms that prioritise user safety are more likely to retain users and build trust, which ultimately contributes to long-term sustainability and profitability.</p> <p>Initiating provider assessments in 2027 is too delayed. An earlier timeline is essential to maintain pressure on providers and ensure timely and meaningful change. These assessments should also be conducted regularly and published transparently to incentivise providers to engage with and implement the good practice measures outlined in the Guidance.</p> <p>These practices should be mandated, with clear expectations and consequences for non-compliance. Without a regulatory requirement, there is a significant risk that many providers will fail to adopt the necessary measures to prevent online harm on their platforms and nothing will change for women and girls.</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? – N</p> <p>To maximise the effectiveness of the Guidance, Ofcom should position it as a strategic opportunity for service providers. While there may be perceived risks or costs associated with implementation, the long-term value of creating a safe online environment should be clearly communicated. This includes not only the protection of</p>

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	<p>users, but also the reputational, operational, and commercial benefits that come with being seen as a responsible and safety-conscious platform.</p> <p>It is also important to emphasise that the adoption of the Guidance will deliver positive outcomes for all users, not solely women and girls. By embedding inclusive safety measures, providers can enhance the overall user experience, build trust, and foster more resilient and supportive online communities.</p> <p>The overall impact of this Guidance, and the associated good practice recommendations, will ultimately depend on the extent to which service providers choose to implement them. Without a mandatory framework, it is unlikely that the Guidance alone will lead to significant improvements in the online safety of women and girls.</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>Confidential? – N</p> <p>White Ribbon UK works across England and Wales to prevent men’s violence against women and girls. Any opportunity to use the Welsh language is important in ensuring that Welsh is not treated less favourably than English.</p>

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