



# Consultation response form

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## 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>Women's Aid Federation NI would like to thank Ofcom for the opportunity to respond to this important issue, which unfortunately continues to significantly impact many women and girls across the United Kingdom.</p> <p>As the largest organisation in Northern Ireland supporting those affected by violence against women and girls (VAWG), Women's Aid has witnessed first-hand the harm caused in online spaces by perpetrators of domestic abuse and other forms of gender-based violence.</p> <p>Since the COVID-19 pandemic, an increasing number of women presenting to our services have reported that technology and digital platforms are being used by perpetrators as an extension of coercive control. Examples include social media accounts being monitored or flooded with threats, and intimate images, whether shared consensually or not—being distributed online by perpetrators to cause fear, distress, and harm.</p> <p>A significant challenge we face in Northern Ireland is the lack of a robust understanding amongst authorities of the online space as a public space in its own right. As a result, appropriate actions are not always taken to protect women. Survivors have frequently been told to “<i>just delete your social media</i>” or “<i>just block him,</i>” placing the burden of safety on victims rather than holding perpetrators accountable. This is especially difficult for women who use online spaces as part of their job to market their business, create content, etc., who simply cannot come off social media as it affects their livelihood – and feel stuck in a helpless situation.</p> <p>A Survivor engaged in our services told us her experience: <i>“There was damage done to my car, and he had to pay to fix it. He had a fine, and he was messaging me to pay these fines, and because I wasn't replying it was screenshot, screenshot, screenshot, and there was all these notifications coming through —I</i></p>

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	<p><i>mean, hundreds. Because I reported it to this detective, it didn't mean anything because it wasn't a physical message, he wasn't approaching me in the street, it didn't breach his bail conditions."</i></p> <p>Women have told us that such messaging from authorities strips them of their freedom to participate in digital spaces, while their abusers face little consequence for their actions.</p> <p>It is vital that everyone has the right to feel safe online. As social media is now a fundamental part of daily life for many, platform providers must take responsibility for ensuring the environments they manage are safe and inclusive for all users.</p> <p>Given this context, we feel Ofcom's proposed approach to content and activity which disproportionately affects women and girls is most needed and is a step in the right direction to meaningfully create safer online spaces for women and girls. This guidance must mark the beginning of a cultural shift within online spaces. A zero-tolerance approach is essential to meaningfully address violence against women and girls in all areas of society, including the digital sphere.</p> <p>A woman would not be expected to tolerate verbal abuse in a physical public space such as a bar or shop—so why, as a society, should the same abuse sent via a message be treated any less seriously?</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>1. Ensure that governance and accountability processes address online gender-based harm, for example by consulting subject matter experts and setting policies that prohibit these harms.</b></p> <p>Women's Aid NI greatly welcome the recognition in this proposed action to consult with subject matter experts when addressing online gender – based harm. As the largest support service in our jurisdiction, women are unfortunately telling our support workers new ways in which perpetrators are using online spaces and technology to continue their abuse. They are finding it increasingly difficult to navigate how to make these actions stop. One recent example is of a perpetrator creating multiple fake social media accounts to 'friend' request the victim, despite the victim having a Non-Molestation Order in place.</p> <p>Engaging with subject matter experts on this important issue is something that Ofcom have been very strong on, and we wish</p>

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	<p>to commend you on this. Organisations such as ours understand the need for Ofcom as the ‘lynch pin’ to help ensure that there are effective and robust governance and accountability processes with the large online companies to be able to react to harmful behaviours that cause many women and girls across the UK unnecessary fear and distress.</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>Ensuring the voices of victims and survivors of violence against women and girls are heard is a core principle of Women’s Aid NI, and we welcome the inclusion of a proposed action specifically focusing on risk assessments with reference to engaging with victims and survivors.</p> <p>That said, we believe that any survivor engagement must be carried out in a trauma-informed and supportive manner, to ensure those who engage are meaningfully heard, while also ensuring that their wellbeing is not unnecessarily compromised or harmed.</p> <p>In collaboration with our sister organisations – Welsh Women’s Aid, Scottish Women’s Aid, Women’s Aid England, and Imkaan – we have created <a href="#">a guide to meaningful survivor engagement</a>. This is intended to support organisations in ensuring that any engagement with survivors is carried out using trauma-informed practices.</p> <p>We would be happy to engage with Ofcom in the future to ensure that all participants in survivor engagement are supported within a trauma-informed environment.</p> <p><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>Many of the thousands of victims and survivors of domestic abuse we support each year in Northern Ireland tell us about the barriers they face when trying to leave an abusive relationship, and the unnecessary fear and distress they experience while navigating their way to a place where they feel safe and are safe.</p>

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	<p>A lack of clear communication, along with the challenge of navigating policies and processes amid traumatic events and living in fear, remains a major barrier for women.</p> <p>It is vital that any messaging, including policies and procedures aimed at reducing harm online, is clear and concise so that everyone can understand it — especially those experiencing trauma and seeking safety, both physically and emotionally.</p> <p>Transparency in all its forms is paramount when creating safer online spaces for women and girls. We therefore welcome the inclusion of transparency as a specific proposed action, as it is essential in efforts to reduce harm.</p> <p><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>In a modern world where the digital space and technology is constantly evolving, the inclusion of proposed abusability evaluations and product testing is welcomed to stave off harmful practices as they emerge.</p> <p>As highlighted previously in this response, Women’s Aid Services in Northern Ireland are unfortunately hearing of more ways in which perpetrators are becoming ‘innovative’ and using emerging and more accessible technology and methods within digital spaces to cause harm to women and girls.</p> <p>It is essential to meaningfully reduce harm to be active instead of reactive to new and emerging harms, so we welcome this dedicated proposal.</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>As highlighted earlier in this response, the challenge of navigating policies and processes during traumatic events and living in fear remains a significant barrier for women seeking to access Women’s Aid services after experiencing abuse.</p> <p>For women who fear for their personal safety, we have a moral obligation as a society to remove any barriers that prevent them from feeling and being safe.</p> <p>It is vital that digital companies maximise safety controls from the outset of the user relationship, to ensure individuals are in a stronger position of safety by default.</p>

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	<p>As we know, members of the public do not typically read documents such as terms and conditions or safety information when using social media recreationally. Therefore, strong default protections are essential to ensure users engage with platforms from a baseline of greater safety, and we therefore welcome this proposal.</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>Unfortunately, image-based abuse is becoming an increasingly common tactic used by perpetrators, often as an extension of coercive control. Women’s Aid lobbied the NI Assembly extensively for the threat to publish image-based abuse to become a specific offence in Northern Ireland — a change that came into force under the Justice (Sexual Offences and Human Trafficking) Act 2022.</p> <p>Women have described the distress they endure when trying to have non-consensual images of themselves removed from online platforms — images uploaded by perpetrators without their consent. They often face an uphill battle in contacting companies and urging them to act.</p> <p>With the increasing use of AI and ‘deepfake’ technology, it is more important than ever that the process of removing such content is made simple and accessible. The increased use of ‘<i>deep fake</i>’ sexual abuse imagery is of particular concern, unfortunately as this horrendous action has become easier for perpetrators to create. Academics such as Professor Clare Glynn have published a number of research papers on this topic, highlighting the need to address this right across the UK:</p> <ul style="list-style-type: none"> <li>• <a href="#">The New Voyeurism: Criminalising the Creation of "Deepfake Porn"</a></li> <li>• <a href="#">Sexual Violence as a Sexual Script in Mainstream Online Pornography</a></li> </ul> <p>Companies must respond swiftly and robustly when a report is made. Where they fail to do so, action must be taken to ensure that inaction does not become the default, or a common experience for those making complaints.</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>

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	<p>As highlighted in our comments on proposed action five, it is vital that digital companies maximise safety controls from the outset of the user relationship, to ensure individuals are in a stronger position of safety by default.</p> <p>As with every space in society, members of the public come from a wide range of backgrounds and experiences, and not every user will have the same level of proficiency in using online safety settings. Indeed, <a href="#">research conducted in 2025 by KPMG and the University of Melbourne</a> found that:</p> <ul style="list-style-type: none"><li>• Almost three quarters (73%) of people in the UK have had no AI training or education.</li><li>• 72% of the UK public are unsure if online content can be trusted</li></ul> <p>It is therefore essential that safety options — including features such as the bulk blocking of multiple accounts — are as simple and accessible as possible, so that everyone, regardless of ability, can secure their online spaces quickly and effectively.</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>Women’s Aid NI particularly welcomes this proposal, which is regrettably needed. We support thousands of women every year, many of whom seek protection orders or provide evidence to the police of domestic abuse or stalking, to demonstrate the behaviours being inflicted upon them.</p> <p>Amid traumatic and dangerous events like trying to leave an abusive relationship, a report-building system can be lifesaving, helping a victim of abuse to gather the evidence they need to report to the police or share with their solicitor when seeking a protection order. As noted earlier in this submission, digital abuse is now a common tactic used by perpetrators as an extension of coercive control.</p> <p>Ensuring that this proposed action is accessible and meets the needs of users could help save lives, and we would welcome its adoption as standard practice across all social media platforms.</p>

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	<p data-bbox="746 271 1455 383"><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 data-bbox="699 405 1455 786">In order to meaningfully address online behaviours that disproportionately affect women and girls, companies must respond swiftly and robustly when a report is made, and take appropriate action against perpetrators of such harm. This stems from the understanding that online spaces are simply another form of public space. If a customer were repeatedly causing harm to others in a bar, they would be removed by security and barred from returning, as part of the business’s duty of care. Why should harmful actions committed in an online space be treated differently?</p> <p data-bbox="699 808 1455 1122">If companies that manage online platforms truly want to take user safety seriously, they must take effective and meaningful action. Where they fail to do so, steps must be taken to ensure that inaction does not become the norm. While this may fall outside Ofcom’s remit, we call on the UK Government to further legislate to ensure that appropriate and effective measures can be taken against digital companies that systematically fail to protect their users from harm.</p>
<p data-bbox="204 1171 671 1518"><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 we should consider? Please provide evidence to support your comment.</p>	<p data-bbox="699 1171 1455 1440">A number of the good practice recommendations are outlined in this guidance, and we welcome examples of a trauma-informed approach to tackling online harm, including features such as ‘quick exit’ buttons as mentioned. We would strongly welcome the establishment of a ‘trusted flagger’ programme as a way to more effectively support victims and survivors of online abuse.</p> <p data-bbox="699 1462 1455 1697">Women often engage with Women’s Aid services to find safety and work towards ending the abuse they are experiencing. While we are support specialists, having access to tools such as trusted flagger status would enable us to assist the women we support more rapidly and effectively, particularly those in extremely vulnerable situations.</p> <p data-bbox="699 1720 1455 1910">Many people using social media, for example, may not know how to navigate reporting processes or feel confident using digital platforms. Collaborating with trusted organisations that can support vulnerable victims and survivors can help to reduce distress and trauma during these critical moments.</p> <p data-bbox="699 1933 1455 2000">It is also important to highlight that the United Kingdom comprises four distinct legal jurisdictions, each with its own justice</p>

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	<p>system and victim support frameworks in relation to violence against women and girls (VAWG). In light of this, we respectfully request that trusted flaggers be distributed evenly across the UK to ensure equitable access to linked support services for women and girls, regardless of their postcode.</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>Women's Aid warmly welcomes Ofcom's commitment to tackling the very real harms that disproportionately affect women and girls in online spaces. We particularly welcome your willingness to take enforcement action where providers fail to act promptly to address risks on their platforms.</p> <p>It is essential that companies take online harm seriously. However, it is equally important that the public is kept informed about the actions being taken, in the interests of transparency, understanding, and genuine accountability.</p> <p>Any action taken should be communicated to the public in clear and accessible terms, as the technical aspects of digital platforms may not be easily understood by all.</p> <p>Without accessible information, members of the public may mistakenly believe they are safe online, even when poor practices are in place.</p> <p>One suggestion to support public understanding would be the introduction of a 'traffic light' rating system to assess good practice on social media platforms, for example. This is a simple, familiar concept that could help users easily identify platforms with strong privacy and safety standards.</p> <p>Ultimately, digital companies rely on users as part of their business model. If the public loses confidence in a platform's ability to prioritise their safety, and chooses to disengage as a result, companies will have a stronger incentive to adopt best practices and maintain user trust.</p> <p>If online platform providers are genuinely committed to user safety, they must implement clear, decisive, and effective measures. When they fall short, it is essential that safeguards are in place to prevent inaction from becoming standard practice. Although this may be beyond Ofcom's current authority, we again urge the UK Government to further legislate to ensure that robust mechanisms are available to hold digital companies accountable when they consistently neglect their duty to protect users from harm.</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>N/A</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>N/A</p>

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