

# 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><b>The selection of four online gender-based harms</b></p> <p>We support the focus on four particular harms in the guidance: online misogyny, online harassment, online domestic abuse, and image-based sexual abuse are all harms that significantly impact the lives of survivors of domestic abuse.</p> <p>Women's Aid strongly support the focus on online domestic abuse as a key harm. In 2019, <a href="#">72% of women who accessed support from Refuge</a> identified that they were experiencing tech abuse. Survivors have shared with us experiences across a wide range of technologies, including online harassment:</p> <p>"He has hacked my account several times and watches my conversations. I am conscious of speaking to anyone about him via social media or messenger."</p> <p>However, we would suggest this is reframed as "technology-facilitated abuse" to capture the full scope of harm and include technologies like Internet of Things devices in the home. We support the Online VAWG Network's recommendation to further focus on the experience of girls in this guidance, and address how technology-facilitated abuse occurs in girls' relationships.</p> <p>We support the inclusion of image-based sexual abuse as this is increasingly being used by abusive partners and former partners as a tool to control, humiliate and instil fear. In Glamour, Refuge and Rape Crisis' survey, 20% of 18-24 year olds had experienced image-based abuse, and an additional 21% thought this might have happened to them. Women's Aid would suggest this area be amended to "image-based abuse" – based on <a href="#">Chayn's guidance</a> – as not all forms of this abuse are inherently sexual. For example, if a</p>

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	<p>man creates an image of a woman without her hijab while she is experiencing “honour”-based abuse, this may increase the likelihood of risk of harm to her but is not sexual.</p> <p>The inclusion of online misogyny is key as <a href="#">our Influencers and Attitudes research</a> has demonstrated that those exposed to misogynistic views on social media have significantly more harmful perceptions of relationships and greater tolerance of doing harm. This research also found that 31% of boys in Key Stage 3 and 21% of girls reported they’d been exposed to social media content expressing hatred against women/girls. This online misogyny is now normalised; UCL’s Safer Scrolling study that found by the fifth day after joining TikTok, more than half the videos seen will present misogynistic content including objectification and sexual harassment<sup>1</sup>.</p> <p>It is important to note how deeply interconnected the four harms are. Misogyny underpins domestic abuse. <a href="#">The majority of domestic abuse is perpetrated by men against women</a>. It is <a href="#">rooted in women’s unequal status in society</a>. The sexism in our society creates a context that enables men to control and abuse women. Those exposed to misogynistic social media content are almost <a href="#">five times more likely</a> than those not exposed to view hurting someone physically as acceptable if you say sorry afterwards. ONS data shows that <a href="#">more than four in five image-based abuse prosecutions are domestic abuse related</a>. Online harassment is experienced by many survivors:</p> <p><i>“[They] watched everything I did on my social media. Got other people to watch and report back. Tried to hack my accounts. Followed lots of my friends to see what I was doing. Stalked my family and friends via social media.”</i></p> <p><b>Voluntary nature of this guidance</b></p> <p>Women’s Aid remain concerned with the effectiveness of voluntary guidance in this area. As <a href="#">the Online Safety Act Network notes</a>, “there is no particular status accorded in general by the law to the notion of ‘guidance’”. The</p>

<sup>1</sup> Regehr, K., Shaughnessy, C., Zhao, M. and Shaughnessy, N. (2024). *Safer Scrolling: How Algorithms Popularise and Gamify Online Hate and Misogyny for Young People*. [online] Available at: <https://www.ascl.org.uk/ASCL/media/ASCL/Help%20and%20advice/Inclusion/Safer-scrolling.pdf>.

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	<p>VAWG (Violence Against Women and Girls) sector campaigned for a <a href="#">mandatory code of practice</a> and has shared <a href="#">multiple concerns about the lack of requirement</a> to implement Ofcom’s voluntary guidance. Much of Ofcom’s draft guidance aligns with the VAWG Code of Practice however this was published in 2022 and there are many platforms that have not implemented these steps.</p> <p>This lack of take up of voluntary initiatives is also seen in a <a href="#">2021 presentation from the Match Group</a> where they ask employees, “Do we only publish where we are required to by law? Do we push back on how much we are required to reveal, or do we try to go beyond what is required?”</p> <p>The take up of voluntary Codes will be at the discretion of the platform, for example, in 2023, <a href="#">Twitter left the EU voluntary Code of Practice</a> against disinformation. This approach may rely on a form of self-regulation from tech platforms where they select which steps they would like to pursue and while this may fill some gaps, <a href="#">platforms can choose to do this in a self-interested way</a>. For instance, Google previously committed to seven AI principles and four areas where it would not implement AI, only to later <a href="#">remove these guidelines and reverse its commitment not to use AI for weaponry</a>. Tech platforms may commit to some best practice steps while this is in their interest, it does not mean they will be in place long-term if there is no meaningful incentive or requirement to do so.</p> <p>Furthermore, even where there is a mandatory Code, if there is no clear mechanism for monitoring, compliance will remain difficult. For example, the <a href="#">Age Appropriate Design Code impact assessment</a> from the Institute of Digital Media and Child Development shares the difficulties of monitoring compliance with an ambiguous code where compliance may be intangible or take many forms.</p> <p>Women’s Aid support the Online VAWG Network’s joint response to the Guidance and its suggestion of changing these “foundational steps” to “minimum steps” to make clear that these are the baseline and platforms must be encouraged to go further.</p> <p><b>Consultation</b></p> <p>Women’s Aid echo the wider <a href="#">VAWG sector’s concerns on the illegal content consultation</a> and how accessible this guidance and consultation will be for civil society, and that</p>

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	<p>this could lead to a bias towards the responses from technology companies. We would encourage continued stakeholder meetings throughout this process with smaller charities, and particularly those services that are led by and-for marginalised communities. As part of this engagement, Ofcom should engage with sector representatives, including members of the new Home Office VAWG Strategy Advisory Board, to ensure that progress is monitored as part of the Government's broader ambitions to halve VAWG in a decade.</p> <p><b>Intersectionality</b></p> <p>There is a need for further and more action-driven engagement with intersectionality. This is in line with Ofcom's public sector equality duty under section 149 of the Equality Act 2010 and the requirement to have due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it. Because of this, Ofcom must ensure platforms make reasonable adjustments for survivors with protected characteristics including sex, race, sexual orientation, age and disability.</p> <p>This is particularly crucial for Black and minoritised women who are <a href="#">three times as likely to have seen or experienced sharing of intimate images without consent</a>. This is seen across types of harms and platforms; in <a href="#">Glitch's Digital Misogynoir report</a>, they found over 9,000 more highly toxic posts about Black women than white women. While this heightened risk is mentioned in places throughout the guidance, there are few related actions. Women's Aid supports Glitch's calls for technology platforms to have clear definitions of and policies on misogynoir, misogyny, racism and white supremacy, and the release of transparency reports with disaggregated data including race, gender and other identity characteristics, for example.</p> <p>There are also no actions specifically considering the experiences of LGBTQ+ women and girls despite <a href="#">75% of LGBTQ+ women experiencing online abuse compared to 33% of non-LGBTQ+ women</a>. While the recommended actions (if taken up) would potentially promote a safer online environment for all users, there is room for more specific consideration of the needs of LGBTQ+ women. This</p>

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	<p>is advocated for in <a href="#">DSIT's report on the impact of platform design on online VAWG</a>, where they state the need for "platform safety solutions specific to the LGBTQ+ community, and specific groups within the community". More research and recommendations in this area can be found in the Centre for International Governance Innovation's <a href="#">Special Report on Supporting Safer Digital Spaces</a>.</p> <p>Additionally, while the emphasis on accessible communications (Terms of Service, surveys, supportive information) is helpful, accessibility is not defined. There is the need for more consideration of the needs of disabled women; <a href="#">a group three times more likely to experience abuse</a>. Ofcom could explore the recommendations of <a href="#">the sector's report on communications barriers</a> experienced by Black, Minoritised, Migrant, d/Deaf and Disabled survivors. For example, the use of communication aids i.e. Alternative and Augmentative Communication; transparency around learnings from engagement with survivors; responsibilities to improve responses to these survivors.</p> <p><b>Safety by design</b></p> <p>Women's Aid strongly support a safety by design approach, which will reduce the burden on survivors to manage their own safety at an individual platform and settings level and move the onus to the platforms where abuse is taking place. Beyond this, it will also improve collective safety levels for a platform's wider audience when perpetrators are prevented from using these platforms for abuse.</p> <p>We advocate for the <a href="#">principles shared by the Australian eSafety Commissioner</a>, the principles <a href="#">outlined by DCMS</a>, and the additional principles proposed in the <a href="#">VAWG Code of Practice</a>. However, we echo <a href="#">the concerns of the Online Safety Act Network</a> that there is not a common definition of this term, as evidenced by these varying approaches, and there is no measurable level of safety that allows a platform to say they follow a safety by design approach. This will need further defining since a technology platform's understanding of safety and risk will not be the same as that of the sector. Risk changes and fluctuates during a survivor's experience and safety may mean something different at any given point.</p> <p>Additionally, while measures to improve setting controls, takedown processes and the like are welcome, Ofcom</p>

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	<p>should account for safety by design from design processes through to deployment. For example, the guidance should include measures from the NSPCC’s Targeting Girls Online report such as removing dark design patterns, implementing ‘cooling off’ periods once connections are made between users, and implementing use of anti-screen recording technology.</p> <p>Beyond a safety by design approach, technology platforms could benefit from engagement with <a href="#">Design Justice</a> and <a href="#">trauma-informed design principles</a>.</p> <p><b>Technologies and futureproofing</b></p> <p>While we appreciate the need to be platform-agnostic in places to future-proof this guidance, there is room for greater focus on the impact of artificial intelligence and emerging technologies. DSIT’s <a href="#">Technology and Trust and Safety report</a> has found that platforms are underprepared for the threat of generative AI. <a href="#">Example artificial intelligence safety measures</a> could include:</p> <ul style="list-style-type: none"> <li>• External auditing;</li> <li>• Specified risk thresholds;</li> <li>• If – then commitments;</li> <li>• Incident reporting;</li> <li>• Whistleblower protection.</li> </ul> <p>There could also be increased transparency measures such as <a href="#">public disclosures of model training where any AI is in place</a> and/or <a href="#">public disclosures of safety incidents</a>. Women’s Aid recommend Ofcom place significant focus on the role of algorithms and how these change our culture, amplify misogyny, and enable abuse. There should be guidance dedicated to preventing deepfake abuse including the <a href="#">ban of nudification apps</a>. There should be consideration of emerging technologies such as the metaverse and the use of chatbots as companion apps.</p>
<p><b>Question 2:</b> Do you have any comments on the nine proposed actions?</p>	<p>Confidential? – N</p>

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<p>Please provide evidence to support your answer.</p>	<p><b>Summary</b></p> <p>Women’s Aid welcome suggested measures to address the prevalence and impact of online gender-based harms, and we would urge Ofcom to go further. Many steps defined as good practice should be seen as the default, including working with the VAWG sector. We suggest engagement with sector resources like the <a href="#">research integrity framework</a>, as well as existing work from technologists and academics dedicated to this work such as the <a href="#">Trust and Abusability Toolkit</a> maturity model and the gaps found in the <a href="#">Global Transparency Audit Report</a>. We support civil society calls to action such as the <a href="#">NSPCC’s proposal</a> for abusability testing to include a gendered analysis of risk.</p> <p>We support measures to introduce supportive signposting around domestic abuse, include safer exit buttons and establish trusted flagger programmes, but we recommend further detail on the involvement of charities, the resources to support this engagement, and the safety requirements needed for survivors. Women’s Aid would recommend that missing measures from the <a href="#">VAWG Code of Practice</a> are adopted, and that Ofcom focus further on intersectional experiences and the experiences of women and girls of all ages. We would welcome additional actions around prevention, designing out risk, and addressing the role of algorithms and artificial intelligence.</p> <p><b>Action 1</b></p> <p>While the rationale between the split between foundational and good practice steps is clear in that foundational actions are from measures previously established in Codes, Women’s Aid believe Ofcom should be working towards making steps mandatory. For example, the need to consider intersectionality, to consult with subject matter experts and pay them accordingly are not considered optional by the sector and we know that where they are optional, they will not always be followed.</p> <p><b>Action 2</b></p>

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	<p>We support the risk assessment of platforms, particularly the good practice steps of using external assessors with expertise in areas such as controlling and coercive behaviour. It is our experience that technology companies do not have the in-house expertise to be able to confidently and safely risk assess threats relating to domestic abuse and understand where these risks may play out on their platforms. We also support engagement with survivors through user research as they will always be the experts in their own experiences, but we would encourage platforms to engage with services throughout this process to explore how to work with survivors safely. For example, they could make use of the <a href="#">research integrity framework</a> published by the four Women’s Aid federations from Scotland, England, Wales, and Northern Ireland.</p> <p><b>Action 3</b></p> <p>We strongly agree with the need for transparency reporting and would encourage further detail about the information that could be disclosed either as a foundational or good practice step. For example, the <a href="#">Integrity Institute’s Global Transparency Audit Report</a> has found multiple gaps in transparency reporting, including the scale of users exposed to risk, how this relates to design features, and which vulnerable populations this affects.</p> <p><b>Action 4</b></p> <p>We agree techniques such as product testing, red teaming and abusability evaluations can be part of a wider process to build safer systems that are less open to abuse. Though as stated in the <a href="#">Trust and Abusability Toolkit</a>, it is not possible to ‘design out’ harm entirely, the toolkit’s maturity model offers a way of understanding it . Women’s Aid would strongly recommend consultation with experts from the domestic abuse sector in order to be able to accurately identify points where harm may happen. We support the <a href="#">NSPCC’s proposal</a> of all abusability testing to include a gendered analysis of likely risk.</p> <p><b>Action 5</b></p> <p>We strongly encourage the take up of good practice steps to set safer defaults, including a strong default to privacy</p>

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	<p>and the bundling of safety settings to reduce the burden on survivors. Making it clear which users are currently connected to an account and where devices are logged in could greatly support survivors to identify where monitoring is taking place, reduce gaslighting they are experiencing around this, and provide a clear method to remove a perpetrator from accounts.</p> <p><b>Action 6</b></p> <p>The use of persuasion, removal and reduction on-platform is an area that shows promise to reduce the likelihood of technology-facilitated abuse and increase engagement with safety processes. For example, <a href="#">in research published in an Ofcom discussion paper series</a>, when actively prompted by a nudge with an option to report, the number of participants reporting went from 2% to 22%.</p> <p>This has also been seen outside of simulated environments, for example in 2021, <a href="#">Twitter tested prompting users to review potentially harmful or offensive posts</a> they had drafted. They found that if prompted, 34% revised their reply or decided not to send the post, and after being prompted once, they shared 11% fewer offensive replies in future. In <a href="#">Match’s experiments with harmful messaging</a>, a fifth of those who receive prompts will reconsider the message.</p> <p>However, Women’s Aid would encourage Ofcom to go further in these steps. For example, 4.37 states that content promoting gendered violence should be given a low degree of prominence on children’s recommender feeds. Content promoting gendered violence should never be seen on children’s feeds.</p> <p>In terms of persuasion and identify verification (4.40), we appreciate that this is not simply removing the ability to be anonymous since this is <a href="#">particularly important for LGBTQ+ women, migrant women and survivors of domestic abuse</a> more broadly. The ability to use pseudonyms is recognised as a measure that can help survivors to escape abusive partners <a href="#">by the Special Rapporteur on violence against women</a>. Another option here could be <a href="#">selfie matching</a>, as used by LGBTQ+ platforms, which will have fewer privacy and safety implications than the provision of legal documentation such as a birth certificate or passport.</p>

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	<p>With regards to removal of content and hash matching (4.41), Women’s Aid believe hash matching to be incredibly useful for image-based abuse survivors and support its inclusion, but we would recommend that this action and the related case study (10) are regularly reviewed. This should be evaluated based on technological developments in case of issues relating to the invertibility of hashes, as previously outlined under hash matching’s limitations in <a href="#">Ofcom’s overview of the technology</a>.</p> <p>We support the reduction actions (4.42) that would deprioritise harmful content, remove links to non-consensual imagery sites and nudification apps, and de-monetise content promoting online gender-based harms. We support the blurring of potential harmful content and scanning for duplicates, as advocated for in the <a href="#">VAWG Code of Practice</a> to prevent unsolicited nude pictures as this is a <a href="#">criminal offence</a>. <a href="#">Four in ten</a> (41%) women have received unsolicited nude imagery. This is preventable, as seen with <a href="#">Bumble’s use of automatic blurring</a>, now available as an open-source version.</p> <p><b>Action 7</b></p> <p>Similarly to Action 5, steps to give power to users to control their online experience and reach support (5.14) will help provide survivors with some of the tools to limit their exposure to online harm, though the platforms should be taking that burden away from survivors as much as possible.</p> <p>Supportive signposting around domestic abuse (5.15) and other harms could be a vital resource online. In an <a href="#">exploration of user attitudes towards on-platform interventions</a>, participants wanted support resources from expert organisations, particularly citing charities. This signposting should be regularly reviewed and there should be clear lines of communication with the services being signposted to.</p> <p><b>Action 8</b></p> <p><a href="#">43% of those who experience online abuse report their experiences to internet companies</a> and only 16% express being satisfied. Because of this, tech platforms are in a</p>

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	<p>crucial position to respond to these harms and steps relating to reporting and complaint processes are vital.</p> <p>While Women’s Aid appreciate the inclusion of exit buttons (5.20a) and the footnote linking to Chayn’s trauma-informed design principles, more detail is needed on exit buttons as a key safety measure at a moment which can potentially escalate for domestic abuse survivors. It should be clear that these exit buttons should take the user to an inconspicuous page, remove as many traces from the device as possible, and there should be no ability to press a back button and return to the site.</p> <p>Trusted flaggers (5.20d) can also be a valuable mechanism for survivors to report their experiences and have non-consensual content in particular removed as quickly as possible. However, <a href="#">charities are under-resourced and there may be an imbalance between the trusted flagger and the tech platform</a>. There should be simplified processes for establishing these mechanisms, being supported through the extensive documentation required to demonstrate independence and expertise, and being onboarded as a trusted flagger.</p> <p><b>Action 9</b></p> <p>Women’s Aid encourage the further resourcing of moderation teams (5.24), especially in the context of <a href="#">ongoing de-prioritisation and lay-offs</a>. As recommended in <a href="#">DSIT’s Technology and Trust and Safety report</a>, Trust and Safety teams could receive additional support from their organisations through being involved earlier in the product lifecycle, strong cross-functional partnerships, and delegated authority to make decisions quickly when harm is occurring.</p> <p><b>Additional actions</b></p> <p>There are a number of other actions that could be considered from the <a href="#">VAWG Sector Code of Practice</a>:</p> <ul style="list-style-type: none"> <li>• Establish systems for cross-platform co-operation to ensure knowledge about forms of offending that may present a foreseeable risk of harm and to identify patterns of stalking and abuse across sites.</li> <li>• Consider the impact of autoplay functions;</li> </ul>

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	<ul style="list-style-type: none"> <li>• Ensure outsourced moderation teams and any other external vendors adhere to the platform’s Terms of Service, are trained on Ofcom’s VAWG Guidance, and have employee and mental health protection policies in place (this is also in line with <a href="#">guidance from data workers in Kenya and Germany</a>);</li> <li>• Information requested by government and law enforcement authority in accordance with UK law should be delivered within the time frame specified by national rules or no later than one month of receiving the request;</li> <li>• Put in place effective protections to ensure flagging and court orders are not used for malign purposes by government agencies or law enforcement of any kind to remove content they find objectionable which is neither illegal nor harmful;</li> <li>• Training materials to be made available to regulator, law enforcement and government agencies upon lawful request.</li> </ul> <p>In addition to this, there do not appear to be any actions relating to how tech companies could diversify their own teams, despite 2.47 acknowledging the impact of a lack of diverse perspectives in leadership and the <a href="#">Department for Science, Innovation &amp; Technology</a> stating that “the lack of diversity in the leadership of online platforms [...] poses a systemic challenge to countering online VAWG”. Women’s Aid would support the inclusion of actions to invest in the recruitment and retention of women in science, technology, engineering, and maths, particularly Black and minoritised women, as advocated for in <a href="#">Glitch’s Digital Misogynoir report</a>. There is room for more actions challenging the overall culture in technology companies.</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 we should consider?</p>	<p>Confidential? – N</p> <p>Women’s Aid strongly support the inclusion of case studies from Chayn, Glitch, and the VAWG Code of Practice (Case studies 5, 15, and 22).</p> <p>Case study 9 on removing geolocation information by default would be a particularly useful step for domestic abuse survivors whose safety can be compromised by the sharing of location information. This would reduce the</p>

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<p>Please provide evidence to support your comment.</p>	<p>burden currently placed on survivors to change their settings or remove geolocation data manually on individual posts.</p> <p>There are some case studies where Women’s Aid would suggest potential edits or further consideration:</p> <ul style="list-style-type: none"> <li>• Case study 7 on red teaming for non-consensual intimate image abuse deepfakes is useful and we would encourage this exercise. Some of the measures within the case study such as removing nudity content from training datasets could be considered as an additional good practice step.</li> <li>• Case study 11 explores a key issue of recommender systems promoting misogynistic content and gendered bias, but these methods of making an algorithm “gender-sensitive” will not address the underlying issues of a lack of algorithmic transparency (both explainability and justifiability), and <a href="#">the algorithm being based on engagement</a>.</li> <li>• Case study 12 on gender-sensitive search services explores how search engines can prevent exposures to non-consensual material through delisting, deprioritising, and reporting, but these all happen on a case-by-case basis with those that technology providers wish to remove or down-rank. Instead, these should never be able to be listed on search engines.</li> </ul> <p>Other potential case studies could look at the <a href="#">Commonwealth Bank of Australia’s artificial intelligence model</a> used to identify harassment or threats in payment transaction messages and how this could be applied in other circumstances or <a href="#">Chayn’s trauma-informed design principles</a> and how these have been applied to <a href="#">Bloom</a>.</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</p>	<p>Confidential? – N</p> <p>Publishing transparency reporting data and evaluations of how providers are taking up this guidance will enable greater scrutiny and information-sharing about what works and where platforms are not prioritising this work, and further detail would be welcome around how transparency reporting powers will be used.</p>

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<p>providers to take up the 'good practice' recommendations?</p>	<p>Women's Aid support Glitch's suggestion for Ofcom to <a href="#">ringfence budget</a> to engage with civil society organisations on an ongoing basis. This could apply this to the ongoing assessment and reporting, as well as to build and fund an Advisory Council to engage with Ofcom policy recommendations. As part of this engagement, Ofcom should engage with members of the new Home Office VAWG Strategy Advisory Board, to ensure that progress is monitored as part of the Government's broader ambitions to halve VAWG in a decade.</p> <p>Ultimately, the way to the highest level of take-up of this guidance is to make it a legally binding Code of Practice. There is no requirement for tech companies to work on a significant amount of this guidance, and they have no financial incentive to do so when they currently prioritise an engagement-based model that enables misogyny. This is particularly important at a time when the <a href="#">majority of British adults (86%) believe social media companies are not doing enough</a> to protect girls from harm. The guidance does not give enough consideration to the harmful impacts of business models. For example, Facebook <a href="#">communicating to advertisers how it can exploit "moments of psychological vulnerability"</a>, or the recent claim that <a href="#">Facebook tracked when teenage girls deleted selfies in order to advertise beauty products in that moment</a>.</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>The impact assessment gives consideration to the burden for platforms, but does not give consideration to the impact of these harms on women and girls, and the potential impact the suggested measures could have on our online experiences.</p> <p>Women's Aid agree with A2.9 that any interference with freedom of expression is proportionate to the legitimate aim of protecting the rights of others and promoting public safety. With <a href="#">one in three (36%) UK women having experienced online abuse</a>, representing over 11 million women, there is a clear and immediate need to protect their rights and safety. The Special Rapporteur on violence against women has <a href="#">previously explored online violence against women and girls from a human rights perspective</a> and found that technology-facilitated gender-based violence hinder women's and girls' enjoyment of human</p>

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	<p>rights and ability to achieve gender equality. This is mirrored in UN Women and the World Health Organisation’s proposed definition of technology-facilitated violence against women:</p> <p><i>“Technology-facilitated violence against women (TF VAW) is any act that is committed, assisted, aggravated, or amplified by the use of information communication technologies or other digital tools, that results in or is likely to result in physical, sexual, psychological, social, political, or economic harm, or other infringements of rights and freedoms.”</i></p> <p>The <a href="#">Human Rights Council resolution 31/13</a> recognises that human rights protected offline must also be protected online. Particular rights that may be impacted by technology-facilitated abuse include:</p> <ul style="list-style-type: none"> <li>• The right to live free from gender-based violence<sup>2</sup>;</li> <li>• The right to freedom of expression and access to information;</li> <li>• The right to privacy and data protection;</li> <li>• The right to access and use digital technologies<sup>3</sup>;</li> <li>• The right to participate in public and political life.</li> </ul> <p>The <a href="#">United Nations’ General Assembly’s Resolution 71/199</a> also recognises that violations of the right to privacy online have particular effects on women and children, and those who are vulnerable or marginalised. This was reaffirmed by the Human Rights Council in <a href="#">resolution 34/7</a>.</p> <p>We support Ofcom’s recognition in the rights assessment (A2.11) of the chilling effect online harms are having on women, as seen in previous <a href="#">Amnesty International research</a> that found over three quarters (76%) of women who have experienced abuse or harassment on social media have changed the way they use the platform, with almost a third (32%) of women saying they have stopped posting content that expressed their opinion on certain issues. In <a href="#">the Victim Commissioner’s report on the impact of online abuse</a>, more than half of respondents agreed the</p>

<sup>2</sup> <https://documents.un.org/doc/undoc/gen/g18/184/58/pdf/g1818458.pdf?OpenElement>

<sup>3</sup> <https://www.esafety.gov.au/sites/default/files/2024-09/SafetyByDesign-technology-facilitated-gender-based-violence-industry-guide.pdf?v=1726531200021>

Question	Your response
	<p>abuse made them withdraw from the world, both online (51%) and offline (58%). When asked what they wanted from internet companies when reporting online abuse, respondents shared that the most important outcomes was for the abuse to stop (48%), for the abuser to be prevented from continuing (57%), and the abuser to be removed from social media (44%). <a href="#">One survey</a> of almost 4,000 women found that 40% are worried about image-based abuse happening to them, rising to 58% of disabled women. These fears deeply impact our right to freedom of expression.</p> <p>For more detail on the legislation in this area, we would refer Ofcom to <a href="#">Professor Lorna Woods' detailed paper on freedom of expression and other human rights</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>Confidential? – N</p> <p>Women’s Aid support the good practice steps of considering what languages are necessary when developing platform policies, user surveys, information about account access, and reporting processes. However, this consideration is largely only referenced in the footnotes of these steps and there is only one reference to “Welsh” in the draft guidance, the link to a translation of the guidance. There is no information in foundational or good practice steps about considering Welsh.</p> <p>Language barriers in reporting are a <a href="#">key barrier</a> for women seeking help, they may not know where to go for support or how to find out about their rights or options. Ofcom’s guidance should make clear that all of the relevant documentation that can impact survivor’s safety (including policies, reporting processes, account updates, user surveys and more) should be available in community languages, and explicitly stating Welsh.</p> <p>There are a number of other recommendations that could be made to support the needs of survivors with common barriers in communications around languages and accessibility. These include:</p> <ul style="list-style-type: none"> <li>• Continuous learning on domestic abuse centring the experiences of Black, minoritised, migrant, d/Deaf, disabled, refugee and asylum-seeking survivors;</li> </ul>

Question	Your response
	<ul style="list-style-type: none"> <li>• Training from services led by-and-for Black and minoritised, d/Deaf and disabled, and LGBTQ+ survivors;</li> <li>• Adherence to <a href="#">Web Content Accessibility Guidelines</a> and further detail on the requirement to produce resources in accessible formats;</li> <li>• Transparency documentation to include specific data on the experiences of marginalised groups, including communities with multiple marginalisations, for example, disabled women.</li> </ul> <p>These are supported by the right to communication in Article 19 of the International Covenant on Civil and Political Rights and Article 2 of the UN Convention for the Rights of Disabled Persons. This is also supported by the Equality Act's Public Sector Equality Duty requiring the removal or minimisation of disadvantages faced due to protected characteristics, taking steps to meet the needs of people with protected characteristics, and encouraging them to participate in public life.</p>

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