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## Centre for Protecting Women Online consultation response for

### *Ofcom: How to promote Media Literacy: Consultation on recommendations for online platforms, broadcasters and services*

#### **Basic details**

**Consultation title:** How to promote Media Literacy: Consultation on recommendations for online platforms, broadcasters and services

**Name of respondent:** Leyla Buran

**Representing (self or organisation/s):** Centre for Protecting Women Online

#### **Confidentiality**

Please tick below what part of your response you consider is confidential, giving your reasons why >

Nothing  >

#### **Declaration**

I confirm that the correspondence supplied with this cover sheet is a formal consultation response that Ofcom can publish. However, in supplying this response, I understand that Ofcom may need to publish all responses, including those which are marked as confidential, in order to meet legal obligations. If I have sent my response by email, Ofcom can disregard any standard e-mail text about not disclosing email contents and attachments. Ofcom aims to publish responses at regular intervals during and after the consultation period. If your response is non-confidential (in whole or in part), and you would prefer us to publish your response only once the consultation has ended, please tick here.

Name: Leyla Buran

#### **About the Centre for Protecting Women Online**

The Centre for Protecting Women Online is focused on understanding and addressing challenges to women's safety online, working collaboratively across sectors to inform research, organisational practice and government decision making.

The Centre's aim is to reduce online harms suffered by women and girls, promote pro-social behaviours online and help build better and more responsible tech and software.



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The Centre is led by Prof Olga Jurasz, Professor of Law and work of the Centre is delivered five interwoven work streams: Law and Policy, Human Behaviour, The Future of Responsible Tech, Ethical and Responsible Tech/AI and Policing.

The Centre is funded by a £7.7 million grant from Research England.

### **Consultation question responses**

#### **Question 1: Is it clear which types of organisations the 10 proposed recommendations are aimed at? Please provide reasons and evidence to support your answer.**

While the consultation identifies a broad set of types of organisations the recommendations are aimed at, it is not entirely clear which specific organisations the proposed recommendations are meant to cover. From the perspective of safety and preventing tech-facilitated violence against women and girls (TFVAWG), the categories are sufficiently broad enough to signal intent but not sufficiently precise to ensure that all relevant organisations with meaningful influence over prohibiting online harms are included. Grouping together very different services as diverse as messaging apps, online games, social media platforms and forums risks overlooking the important differences in their governance, design and associated harms. Evidence from research on TFVAWG shows that patterns of harm differ significantly across these contexts and without greater specificity, the recommendations may not adequately reflect and respond to these differences.

A further area of ambiguity lies in the treatment of digital intermediaries, recommendation engines, ad-tech systems, app stores and infrastructure providers such as content-delivery networks. These organisations play a substantive role in the discoverability and circulation of harmful content yet are mentioned indirectly in the consultation. Research on the use of digital spaces and tools to abuse and harass demonstrates that perpetrators often rely on services to sustain their activity. If the recommendations do not explicitly target this, substantial gaps in the prevention of harm and in accountability are likely to remain.

Additionally, the recommendations applying to services reaching a “significant UK audience” is too vague to be effective operationally. Platforms with a modest number of users can still generate harms for women and girls. Relying on audience size instead of risk could exclude the platforms where TFVAWG is potentially most prevalent.

The same issue appears in relation to generative AI, while not differentiating the difference in the purpose of tools there is no understanding of the difference in risk



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these tools carry. These distinctions are necessary to ensure that tools that carry the risk of perpetuating TFVAWG receive suitable guidance.

While the intent of the consultation is evident, its scope requires refinement. More precise definitions and a risk-based framework would better ensure that the recommendations adequately apply to all relevant organisations. The Centre for Protecting Women Online has developed an ontology of online harms that would be invaluable informing the development of this work to better understand risks associated.

**Question 2: Do you have any comments on whether they should apply to all organisations, including those of different sizes and operating models?**

The recommendations should apply to all organisations that enable, host or distribute digital content, regardless of size or operating model, with obligations proportionate to the level and nature of risk rather than scale alone.

Research on TFVAWG demonstrates that small platforms and niche communities can be sites of significant harm, hosting tightly knit groups that circulate misogynistic content or facilitate targeted harassment, intimate image abuse and coordinated attacks against individual women. Exempting such services because they are small would recreate the regulatory gaps that perpetrators exploit when larger platforms strengthen their safeguards. Exemptions based on size would also encourage harmful activity thriving on smaller or newer services which would leave women and girls with inconsistent levels of protection across platforms.

Differences in operating model should influence the way in which organisations meet their obligations, not whether obligations apply to them at all. A framework that sets universal expectations that recognises different organisational contexts would create a more consistent environment for safety.

**Question 3: Do you have any comments on the proposed recommendations? Please provide comments in particular on their effectiveness, applicability or risks.**

**Recommendation 1, Media literacy by design:**

We welcome the focus on media literacy by design, but the recommendation lacks the specificity needed to support the prevention of TFVAWG. The UK, under both the Istanbul Convention (Articles 12 to 17) and CEDAW (General Recommendation No. 35), has obligations to prevent violence against women and address harmful gender stereotypes, including in digital spaces.



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Media literacy by design must therefore embed gender-sensitive safety features that also account for intersectional experiences, not only generic educational tools. Without explicit reference to gendered harms, platforms may fulfil the recommendation superficially without meaningfully contributing to the prevention of TFVAWG as required under international law and UK policy.

### **Recommendation 2, Clear choices and transparent information:**

Transparency is essential, but the current wording of this recommendation remains rooted in user empowerment rather than in the state's obligation to prevent exposure to harmful content. Under the UK's duties to prevent men's violence against women, platforms should be required not only to explain how choices are shaped, but also to provide safe default settings and easy opt-outs that minimise users' exposure to gendered harassment, if they are not able to prevent this content from being uploaded in the first place.

Women and girls cannot meaningfully exercise agency if they must use systems designed to maximise engagement with harmful misogynistic content. The recommendation should therefore explicitly account for structural risks that undermine the UK's preventive obligations.

### **Recommendation 3, Tools to manage and personalise experiences:**

Tools are only meaningful if they genuinely prevent harm. Women and girls repeatedly report that existing tools fail to stop abuse. Under the Istanbul Convention's requirement to take preventive measures across all sectors, services should be expected to provide tools capable of preventing repeated contact, multi-account harassment and organised misogynistic targeting. Tools must not shift responsibility onto victims, which would contradict the principles of prevention and due diligence that underpin both CEDAW and the Istanbul Convention, further exacerbating the impact of their experiences. Instead, platforms should design tools that meaningfully disrupt abusive incidents and patterns.

### **Recommendation 4, Empower users to critically assess content:**

Critical thinking alone cannot prevent forms of abuse such as non-consensual deepfakes, synthetic sexual imagery or targeted harassment. The UK's international obligations require states to address the root causes of online abuse, not simply equip users to navigate it. This requires coordinated educational opportunities beyond platforms, that target both children and adults to better understand and critically analyse the content they are exposed to and the systems that host and create them. This must be centred in and informed by women and girls lived experiences online. Professor Olga Jurasz's (Director of the Centre for Protecting Women Online), Four



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Nations report presents the most comprehensive study of women's experiences online in the UK, the findings of this report provide solid basis to ground this work on. This report can be accessed here: [Open Research Online](#)

While education is crucial, prevention also requires platform-level controls, rapid takedown systems, systems built to reject harmful content and mechanisms for redress. Without these, the burden of preventing harm falls on women and girls, undermining the UK's duty to exercise due diligence in preventing and mitigating VAWG. The recently published, *The Case for Investing in Primary Prevention: Ending Men's Violence Against Women*, a collaborative report between the Centre for Protecting Women Online and White Ribbon UK, details the importance and urgency of the need to prevent online VAWG, with clear policy recommendations relating to education.

#### **Recommendation 5, Support for parents and caregivers:**

This recommendation must recognise that girls experience gender-specific pressures that are often hidden from parents.

Under Article 14 of the Istanbul Convention, states must promote gender equality and challenge harmful stereotypes among children. Services must therefore provide protections that do not rely solely on parental monitoring, which will likely vary hugely or be unavailable to some young people. Prevention requires that platforms proactively limit harmful interactions and create safer baseline environments for girls, rather than relying on parental literacy on online VAWG alone. This is a fundamentally flawed assumption underpinning this recommendation.

#### **Recommendation 6, Support for expert third parties:**

We strongly support collaboration with expert organisations and note that under the Istanbul Convention (Article 9) states must actively involve specialist women's organisations in prevention. However, this must be more than signposting. It requires adequately funded, sustained partnerships that allow expert organisations to shape design choices, moderation practices and content policies. Without resourcing, platforms may rely on overstretched organisations to provide expertise without the capacity to engage meaningfully.

#### **Recommendation 7, Educational programming by broadcasters and streaming services:**

Educational programming can be a powerful preventive tool if it addresses gendered online harms directly. The UK's obligations under CEDAW and the Istanbul Convention include tackling gender stereotypes and promoting public understanding of violence against women. Programming should therefore explicitly address these issues.



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Prevention requires cultural as well as technical change, which broadcasters and streaming services play a critical role in supporting.

**Recommendation 8, Promote media literacy beyond services:**

Community-based media literacy is valuable, but it must be tied to a clear understanding of the UK's duty to address the structural drivers of TFVAWG as well as its impacts on women and girls.

Public education alone cannot counteract platform incentives that reward misogynistic content. Outreach should be targeted at women and girls who experience intersecting harms, consistent with CEDAW's emphasis on recognising structural discrimination. To serve a preventive function, media literacy initiatives must be accompanied by genuine platform accountability that is legally codified.

**Recommendation 9, Support underserved and diverse audiences:**

The inclusion of diverse audiences is important, but prevention requires explicit recognition that women and girls, particularly those facing intersectional discrimination who are disproportionately targeted by online abuse. Under international obligations, the UK must adopt measures that address the specific vulnerabilities of marginalised women. Inclusive design must therefore incorporate trauma-informed approaches, culturally appropriate reporting mechanisms and safety features that recognise how gender, race, disability or migration status affect online risk.

**Recommendation 10, Evaluate and publish impacts:**

Evaluation must measure outcomes relevant to the prevention of TFVAWG, not only generic media literacy metrics. The UK's due diligence obligations require monitoring the effectiveness of measures to prevent men's violence against women. Platforms should therefore be expected to publish gender-disaggregated data on abuse trends, reporting outcomes, removal of harmful content, and the prevalence of misogynistic content. Without gender-specific evaluation, it is not going to be possible to determine whether the recommendations support the UK in fulfilling its international obligations and UK policy.

**Question 4: Are there any other additional recommendations you think we should consider?**

The Centre emphasises the importance of designing services and interventions that actively prevent TFVAWG and fulfil the UK's international obligations.



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Evidence indicates that women and girls are disproportionately targeted by online harassment, sexual exploitation, and image-based abuse. For example, a 2023 survey by the Office for National Statistics found that one in ten women aged 16 to 24 had experienced online sexual harassment, compared with one in twenty men of the same age. Structural features of digital platforms, such as algorithmic content recommendations, can amplify exposure to harmful material, demonstrating the need for proactive, preventive measures, as envisaged in Articles 12 to 17 of the Istanbul Convention.

Current safety tools, including reporting and blocking features, often fail to prevent repeated or coordinated abuse, placing the burden on survivors to protect themselves. This situation falls short of the UK's obligations under CEDAW and the Istanbul Convention, which require states to take preventive action to address structural drivers of gender-based violence. Complementing these measures with education on digital consent and gender stereotypes enhances effectiveness, in line with CEDAW's General Recommendation No. 35 on prevention through public awareness and education.

Partnerships with specialist organisations are critical for both design and implementation. Such collaborations, if resourced properly, allow platforms to respond far more quickly and appropriately to abuse and ensure services are informed by the lived experiences of women and girls. The Istanbul Convention explicitly recognises the role of civil society in prevention efforts.

Finally, intersectional considerations are vital. Women and girls from marginalised communities face higher exposure to abuse and lower access to support, so prevention strategies must address overlapping discrimination to fully comply with CEDAW's requirements to tackle structural discrimination.

**Question 5: Do you have any examples or suggestions of ways of encouraging services to adopt these recommendations?**

Services are unlikely to make meaningful changes if guidance is voluntary; relying on the goodwill of tech companies is not sufficient to guarantee a positive change for women and girls. Adoption should be encouraged through legislative and regulatory measures that codify obligations to prevent TFVAWG, in line with the UK's commitments under the Istanbul Convention and CEDAW.

This could include mandatory protective defaults, transparent reporting on harassment and takedowns, and independent oversight of these challenges and systems to ensure compliance. Incentivised collaboration with specialist organisations and embedding an intersectional approach will help services design effective, inclusive interventions.



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**Question 6: Do you have any comments on our impact assessment, rights assessment, equality impact assessment and Welsh language assessment?**

The assessments demonstrate awareness of user rights, equality, and accessibility, including Welsh language considerations. However, their reliance on non-mandatory guidance limits their effectiveness, particularly for preventing TFVAWG. Voluntary adoption by companies is insufficient to meet the UK's obligations under the Istanbul Convention and CEDAW, which require proactive, enforceable measures., as well the UK's own policy and guidance. To ensure meaningful impact, these recommendations should be codified in legislation, rather than relying on goodwill.

***If you've any further questions or would like to discuss the expertise of the Centre for Protecting Women Online in relation to these recommendations, please get in contact with Leyla Buran, by emailing [Leyla.Buran@open.ac.uk](mailto:Leyla.Buran@open.ac.uk).***