VAWG SECTOR EXPERTS RESPONSE TO OFCOM'S PROTECTION OF CHILDREN'S CONSULTATION

Issue

Ofcom's Protection of Children consultation is the second major plank of its proposals for the implementation of the Online Safety Act, following the consultation on illegal harms which closed in February this year.

The approach taken in the children's consultation largely mirrors the approach taken to illegal harms, on which charities and experts representing the interests of women and girls had several concerns. In February, forty-four organisations and individuals signed an open letter to Ofcom's CEO, Melanie Dawes, setting these out. While Ofcom officials - at all levels of the organisation - stress in public and in private that the protection of women and girls is a key priority for them in their implementation of the Online Safety Act regime, this joint response sets out our ongoing concerns that the foundations on which the guidance on violence against women and girls (VAWG), due next spring, will sit are not strong enough to provide the level of protection promised by the previous Government during the passage of the Bill through Parliament. We set out more detail on our concerns below.

The urgency of this work and the need for the most robust protections as possible to be delivered under the Online Safety Act is underlined by the findings in the recent National Policing Statement on Violence Against Women and Girls. This found that nearly 3000 VAWG-related offences are recorded by the police daily and, in the year to July 2023, at least 123,515 VAWG offences had an online element. Victims are getting younger; 10-15 year olds are the most common age range (14%). The statement called on "government to strengthen regulation to effectively deter and prevent the ongoing proliferation of VAWG online".

This joint response - on behalf of 12 organisations and academic experts on VAWG - sets out our concerns that Ofcom is not taking a strong enough approach under the existing regulatory framework to address VAWG online and sets out a number of recommendations for Ofcom to strengthen the children's code of practice. It should be read in conjunction with the recent analysis from the Online Safety Act Network, which reiterates many of the systemic and structural concerns of civil society about the approach Ofcom has chosen to take across its two consultations to date. The gap between the two risk registers' evidence of harm and the measures proposed to deal with it - as set out in this table - has particular relevance to VAWG sector concerns.

As Ofcom is still considering the feedback it received to the illegal harms consultation - and has emphasised in the children's consultation that it will be taken in the round with further feedback on these most recent proposals - we urge them to consider how both these sets of proposals could be urgently strengthened to provide the best possible basis for the VAWG guidance - which will not be mandatory - to deliver the long-overdue step-change in women and girls' online experiences.

Our submission provides analysis and recommendations on the following areas which highlighter why the children's codes of practice matter to action on VAWG:

- Weak levels of protection
- Gendered harms
- Age appropriate experiences
- Features and functionalities
- Content moderation
- Burdens on children
- Small platforms

We then round up our recommendations at the end of the document.

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Why the children's codes of practice matter to action on VAWG

Weak levels of protection

The intersection of the measures proposed here and the forthcoming VAWG guidance that Ofcom needs to produce by spring next year is essential. Detailed analysis on the relevant concerns here is available in [the full consultation response from](#)the OSA Network.

The VAWG sector campaigned strongly for a [mandatory code of practice](#) to be included in the Act and an amendment to that effect from Baroness Morgan had cross-party support during the passage of the Bill. In the Lords' debate on that amendment, the then Government Minister, Lord Parkinson, suggested that the existing codes of practice on illegal harms and children's safety would be enough:

> "all service providers must understand the systemic risks facing women and girls through their illegal content and child safety risk assessments. They must then put in place measures that manage and mitigate these risks. Ofcom's codes of practice will set out how companies can comply with their duties in the Bill.
>
> *I assure noble Lords that the codes will cover protections against violence against women and girls. In accordance with the safety duties, the codes will set out how companies should tackle illegal content and activity confronting women and girls online. This includes the several crimes that we have listed as priority offences, which we know are predominantly perpetrated against women and girls. The codes will also cover how companies should tackle harmful online behaviour and content towards girls."* (Our emphasis) ([Hansard: 16 May 2023](#))

Eventually, the Government conceded and brought forward its own amendment to require Ofcom to produce guidance on VAWG. When he spoke to this amendment, Lord Parkinson again stressed how the codes of practice were a fundamental part of delivering improved protections for women and girls:

> "Ofcom's codes of practice will set out how companies can comply with the duties and will cover how companies should tackle the systemic risks facing women and girls online. Stipulating that Ofcom must produce specific codes for multiple different issues could, as we discussed in Committee, create duplication between the codes, causing confusion for companies and for Ofcom …
>
> *Government Amendment 152 will consolidate all the relevant measures across codes of practice, such as on illegal content, child safety and user empowerment, in one place,*

assisting platforms to reduce the risk of harm that women and girls disproportionately face." (Our emphasis) (Hansard: 12 July 2023)

There are two points to make here. Firstly, the guidance is not an alternative route to providing mandatory protections for women and girls as it is not enforceable. As Parkinson explained, the guidance will bring the protections contained in the various codes of practice together in one place along with potentially wide-ranging additional (but voluntary) best practice suggestions; the measures in the code(s) therefore set the foundation for how effective this guidance is likely to be in changing the culture of online VAWG. Secondly, while the VAWG guidance might cover many of the risks to women and girls that have been identified in both the illegal harms and children's risk registers, action to mitigate these risks will not be mandatory without corresponding measures in the codes; so, without an overarching obligation to put in place mitigating measures to address design or functionality risks identified in the risk assessment (as recommended by the OSA Network), companies do not have to act on them. **It is important then that Ofcom gets the balance right between what is in the code(s) and what is in guidance.** Without a sufficient suite of measures (see analysis here) to address the identified risks of harm to women and girls in the codes - the "relevant measures" which Parkinson envisaged would be consolidated in the guidance - then the guidance itself risks being insufficient.

Recommendations to improve protections for women and girls

- A more specific focus on VAWG is needed across Ofcom's illegal harms and children's proposals, and the related codes and guidance. This should ensure that regulated services understand the range of relevant content and activities, spanning both the criminal offences and Primary Priority Content and Priority Content, with a clear link to the stronger measures to mitigate the content-related harms. This should be a priority for the development of the VAWG guidance with concrete cross-references included in further iterations of the sets of codes.

Gendered harms

As part of its general duties under s 3(4) Communications Act, Ofcom has considered the position of people beyond children who are vulnerable but the regulator provides no details as to which groups were considered and how that consideration affected Ofcom's output - especially given the different experiences of men and women online (taken generally). (see Vol 5 14.23)[1]

Ofcom - in Volume 3 (the causes and impacts of harms to children) - also recognises in many instances that there is a gendered risk of harm and that girls are disproportionately more likely to be impacted by some harms than boys. For example:

> "Most evidence suggests that girls are at higher risk than boys of being targeted by bullying content online, especially by certain kinds of bullying content. A recent study by Internet Matters, among 13-16-year-old girls, found that they had received and observed 'hateful comments' on popular social media platforms. These were in response to both content they had posted and content posted by others, and typically targeted girls' appearance such as clothes, weight or bodies, which participants said impacted on their wellbeing. The participants attributed the comments to men and boys and noticed a lack of similar comments on boys' videos." (Vol 3, 7.54)

Evidence from SafeLives "Your Best Friend" report (2021) found that several young people highlighted a worrying trend in schools where networks of boys and young men circulate nudes of girls and young women – when this happens, young people stressed it is young women who are shamed not boys or young men and noted the distressing impact this can have. Ofsted's (2021) review also reported that boys talk about whose 'nudes' they have and share them among themselves like a 'collection game', typically on platforms like WhatsApp or Snapchat, and highlighted the normalised culture of sexual harassment in schools and colleges. The Government produced guidance for schools on the sharing of nudes in 2024, including research on this issue from Revealing Reality.[2]

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[1] Powell, A., Henry, N., 2019. Technology-Facilitated Sexual Violence Victimization: Results From an Online Survey of Australian Adults: Journal of Interpersonal Violence 34, 3637–3665. https://doi.org/10.1177/0886260516672055; Tanczer, L. M., López-Neira, I., & Parkin, S. (2021). 'I feel like we're really behind the game': Perspectives of the United Kingdom's intimate partner violence support sector on the rise of technology-facilitated abuse. Journal of Gender-Based Violence, 5(3), 431–450.https://doi.org/10.1332/239868021X16290304343529

[2] Sharing nudes and semi-nudes: advice for education settings working with children and young people; Department of Education (2024):
https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people

SafeLives' 2022 RSE project showed that boys were more likely to look for information about sex and relationships outside of school online and through watching porn than girls (22% vs 5%) and through websites or online content (27% vs 19%).

Ofcom also recognises the fact that those in other minoritised groups and with intersecting characteristics are also likely to experience some harms and that indirect harm can be caused to women and girls through the proliferation of misogynistic views (6.4, 7.4.26-29, 7.4.38 et seq, 7.6.38), including the specific issue of harmful sexual behaviours and attitudes (7.1.19). We question, however, whether the measures pick up all the identified problems here. We refer Ofcom to the response from Glitch to the illegal harms consultation which flagged the frequent conflations of race and ethnicity, as well as an uneven application of intersectional analysis. Intersectionality and misogynoir should be specifically named and addressed as an evidenced harm (the latter) and an approach (the former) that can help combat these harms among children.

There is a notable omission of misogynistic content in the section on abuse and hate (section 8.6) given that Andrew Tate is mentioned elsewhere in Ofcom's material and his influence and that of "copy-cat" influencers is having an increasing impact on attitudes towards girls and female teachers in schools and a wider societal culture of hatred towards girls and women[3]. Recent research from the UK, Australia and Ireland has revealed how this type of misogynistic influencer content is often pushed to boys on social media services without them even searching for it.[4]

In their recent response to the RSE consultation, the Domestic Abuse Commissioner referenced a report from Women's Aid which "found that children and young people who were exposed to misogynistic social media content, like that of Andrew Tate, were almost five times more likely than those not exposed to view hurting someone physically as acceptable if you say sorry afterwards". The DAC commented that "this highlights the power of social media and problematic content, which if not challenged, may pass into children's everyday belief systems and lives." The largest empirical study into online violence against women in the UK (n=7819)

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[3] See also Laura Bates' book "Men Who Hate Women" (2020)
[4] Stephanie Westcott, Stephen Roberts and Xuenan Zhao: "The problem of anti-feminist 'manfluencer' Andrew Tate in Australian schools: women teachers' experiences of resurgent male supremacy" (2023): https://www.tandfonline.com/doi/full/10.1080/09540253.2023.2292622?src=exp-tr; Institute for Strategic Dialogue: "Algorithms as a Weapon Against Women: How YouTube lures boys and young men into the 'manosphere'" (2022): https://www.isdglobal.org/isd-publications/algorithms-as-a-weapon-against-women-how-youtube-lures-boys-and-young-men-into-the-manosphere/; Anti-Bullying Centre: "Recommending Toxicity: how tiktok and youtube shorts are bombarding boys and men with misogynistic content": https://antibullyingcentre.ie/recommending-toxicity-how-tiktok-and-youtube-shorts-are-bombarding-boys-and-men-with-misogynist-content/

showed that 74% of respondents (80% of women and 68% of men) consider online misogyny as a form of online VAWG.[5]

There is also limited mention of domestic abuse: in the consultation documents, it is only mentioned twice in passing (other than references in footnotes); given the Domestic Abuse Act legally recognised children as victims of domestic abuse in their own right, this feels like another significant oversight.

The focus on age-gating porn (and other primary priority content) may deal with one clearly relevant set of content-based issues but this leads to heavy reliance on a single point of possible failure - ie the effectiveness of the age verification/estimation technology used to keep children off the platform - rather than addressing some of the underlying issues that arise from the design of the platform itself and how its features and functionalities exacerbate the risk of content-based harm. (See also the reference in 15.173 to the fact that violent content (designated as "priority content", with services required by use of age assurance measures "to ensure that children are protected from encountering" it) "can include violence against women and girls which does not meet the threshold of illegality.")

Other issues that may not be addressed effectively due to the focus on age-gating are the importance of good quality information for children and young people particularly in relation to issues surrounding women's rights, gender equality and issues affecting girls, such as sexual education or discussions on reproductive rights. As Glitch noted in their illegal harms response: "We have seen this censorship already in the reproductive justice space and LGBTQ+ rights. These important and diverse perspectives and experiences may be underrepresented or excluded in search results and content moderation decisions, leading to a narrower range of voices and lower quality information available". Measures to improve the breadth and depth of good quality content and information are essential alongside measures to protect from harm.

Recommendations to address gendered harms

- Reference to misogynistic content should be added to the guidance (section 8.6), (eg the tables at 8.6.2 and 8.6.3) setting out the types of content that are deemed to be abusive or incite hatred to women and girls.
- A distinction should be made between incitement to hatred and incitement to VAWG.

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[5] O. Jurasz, (2024). Online violence against women: A Four Nations study. The Open University. https://oro.open.ac.uk/96398/ See also "Misogynistic Pathways to Radicalisation: Recommended Measures for Platforms to Assess and Mitigate Online Gender-Based Violence": https://www.isdglobal.org/isd-publications/misogynistic-pathways-to-radicalisation-recommended-measures-for-platforms-to-assess-and-mitigate-online-gender-based-violence/

Age-appropriate experiences

Ofcom's decision not to require services to deliver age-differentiated experiences for users under-18 - which the Children's Coalition have flagged in their response - is also problematic. For example, para 8.2.9 refers to BBFC and telecoms operators standards in relation to porn but there is no consideration given to the fact that this is an under-18 blanket age restriction and there should be a watershed comparison for younger age groups. The definition of porn as PPC means it's narrowly focused but there isn't any additional consideration for sexually suggestive material which might be harmful to young children (as identified by their assessment of harms).

We note that - as in many other areas (see OSA Network response) - Ofcom cites "limited evidence" as the reason for not recommending differential measures for different age groups, despite the fact that (at 15.98): "We also note that the severity of impacts faced by children within particular age groups when exposed to PC may vary quite significantly and some children will be more vulnerable than others, even in older age groups such as neurodivergent children and children whose gender, race and sexuality may impact the harm they experience from content outlined in Sections 7.4-7.8 in Volume 3 the causes and impacts of harms to children."

We would point to current practice where several regulated companies incorporate at least some aspects of age-differentiated design into their wider safety strategy. Research into how tech companies have responded to the Age Appropriate Design Code[6] points to a number of changes that have been made to make the services age-appropriate. Several major user-to-user services have features which differentiate by age, for example:

- TikTok has in place a curfew which means 13-15-year-old users do not receive notifications after 9pm, whereas 16-17-year-olds do not receive them after 10pm.50 It has also disabled access to direct messaging for under 16s.
- Roblox distinguishes between users under 13 and those 13 and older to provide different experiences. Posts and chats are filtered for inappropriate content and to prevent personal information from being posted if they are under 13, whereas users 13 and older have the ability to say more words and phrases.
- Microsoft Edge provides different settings in its Kids Mode depending on if children are between 5-8-years old, or 9-12-years-old.
- Xbox allows for filtering of content to meet the ages of children based on PEGI content ratings – PEGI 3, PEGI 7, PEGI 12, PEGI 16 and PEGI 18.54 Children can request access to content which parents can approve or deny.

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[6] Children and Screens (2024) *UK Age Appropriate Design Code: Impact Assessment* p.9; See also: Wood, S. (2024) *Impact of regulation on children's digital lives*, Digital Futures for Children, 5Rights Foundation, LSE

- Pinterest makes all accounts under 16 private and the 'boards' and 'Pins' they make will only be visible to them by default. Under 16 accounts can only exchange messages with mutual followers.

We also refer Ofcom to the comments made by Meta whistleblower Arturo Bejar at a recent conference (from 36 mins here) where he mentions "talking to regulators in the UK" and being aware that: *"Social media companies .. particularly Meta .. misrepresent what they are able to do. For example, they talked about their inability to detect under-13 accounts … It's not that hard to find an account that an 8 year old makes. These are all problems that are solvable."* If platforms know the age of their users, it should be possible for them to introduce different measures for those different users. It appears here - as Bejar suggests - that Ofcom is taking at face value platforms describing what they are doing now, without looking at what the capacity of age-verification might be - if properly applied, as required under the Act.

Recommendation on age-appropriate experiences

- The introduction of measures to deliver age-appropriate experiences for children must be expedited. See the children's coalition response for more detail.

Features and functionalities

We welcome the controls around recommender systems, which would be likely to have a cross-harm effect including for issues more likely to impact girls. But other issues and specifically functionalities are not thoroughly dealt with. These include issues where anonymous or fake accounts are a specific factor - for example, material containing self-harm which girls have an increased likelihood of encountering. There are VAWG aspects to services which allow the creation of multiple/disposable accounts - this might have links to sub-criminal stalking, for example, or bullying. See more details in the NSPCC's response to the consultation

Other design features to consider here include, but are not limited to the following[7]:

- Lack of accessible Log Files
- Weak protections on associated online portals
- "Password-reset Attacks"
- Account hierarchies
- Exposure of information
- Gaslighting

Incubator research at SafeLives points out the need for companies to have verification methods so that accounts posting harmful or illegal content are identified. SafeLives conducted the Practitioner Tech Abuse Survey, in which practitioners would describe how perpetrators would utilise harassment and stalking behaviours using social media and apps. For instance, the perpetrator posing as other people on new accounts, threatening the victim-survivor to spread lies about them to their family, friends and colleagues via social media, and hacking into their social media accounts

Here Ofcom's response is not about stopping the problem (through perhaps considering checks on users with multiple accounts) but by putting the onus on users to block/mute accounts (21.76). While the proposed measure is welcome, it does not go to the root of the problem.

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[7] Brown, A., Harkin, D., & Tanczer, L. (2024). Safeguarding the 'Internet of Things' (IoT) for Victim-Survivors of Domestic and Family Violence (DFV): Anticipating Exploitative Use and Encouraging Safety-by-Design. Violence Against Women. https://journals.sagepub.com/doi/10.1177/10778012231222486;

Tanczer, L., López-Neira, I., & Parkin, S. (2021). 'I Feel Like We'Re Really Behind the Game': Perspectives of the United Kingdom's Intimate Partner Violence Support Sector on the Rise of Technology-Facilitated Abuse. Journal of Gender-Based Violence, 5(3), 431–450 https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3931045;

Slupska, J., & Tanczer, L. (2021). Threat Modeling Intimate Partner Violence: Tech Abuse as a Cybersecurity Challenge in the Internet of Things. J. Bailey, A. Flynn, &, N. Henry (Eds.), The Emerald International Handbook of Technology Facilitated Violence and Abuse (pp. 663–688). Bingley: Emerald Publishing Limited. https://www.emerald.com/insight/content/doi/10.1108/978-1-83982-848-520211049/full/html

In the context of self-harm material and also in relation to eating disorder material, for example, Ofcom also notes the impact of likes as validation (which arguably has impacts elsewhere too), but these are not considered in the Codes. While Ofcom suggests some limitations on being added to groups (but not for all services), it does not address stranger pairing which was highlighted in relation to abuse (which can have a gender-based component). In a number of instances, the business model is relevant but again not dealt with in the codes; this is particularly relevant in relation to misogynistic influencers such as Andrew Tate who make a lucrative living from their content creation and related promotions[8]. We suggest that while the proposals on age-gating and recommender systems are important steps, that more should be done to tackle other functionalities - including those higher up the communication chain - and that obligations in relation to them (even a programmatic obligation such as we set out above) should be included - but that in that instance, understanding harm and solutions should be seen through a lens of gender. While we note that Ofcom has chosen to prioritise certain measures which it believes will materially improve the position for children (14.34), it is not clear on what basis this selection was made.

Additionally, threat models around Intimate Partner Violence should become commonplace in order to assess, trial and test the risks and potential attack vectors associated with online services.[9] Such frameworks help to improve the security design of technical systems and will benefit all users more widely.

Recommendations on features and functionalities

- The gap between the specific risk factors relating to features and functionalities that are evidenced by Ofcom as having relevance to harms against women and girls and the lack of associated mitigating measures in the codes of practice needs to be closed, as recommended in the OSA Network response.
- A measure relating to the creation of fake/multiple accounts needs to be added to the codes of practice.

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[8] See here: https://www.youtube.com/watch?v=3MSm6a4_Swk

[9] Slupska, J., & Tanczer, L. (2021). Threat Modeling Intimate Partner Violence: Tech Abuse as a Cybersecurity Challenge in the Internet of Things. J. Bailey, A. Flynn, &, N. Henry (Eds.), The Emerald International Handbook of Technology Facilitated Violence and Abuse (pp. 663–688). Bingley: Emerald Publishing Limited. https://www.emerald.com/insight/content/doi/10.1108/978-1-83982-848-520211049/full/html

Content moderation

It is a significant concern that there are no measures requiring services to use some form of automated content moderation, particularly for large or multi-risk services. For example, Ofcom has received evidence previously from SafeLives of the links between content moderation and the VAWG agenda to support technology companies to understand the context and subtleties of abuse. The example of a picture of someone's front door was given as an example of how innocuous something may appear but can be a significant threat to a victim/survivor of abuse.

Whilst the Codes set out what companies must do in response to harmful content, they are much less clear about how this content should be identified in the first place. There is a significant risk that this will enable services, particularly those who are looking to take a 'hands-off' approach to moderation, to avoid putting proactive systems in place. Human moderation alone - whilst a vital part of the moderation response - will not be able to effectively assess whether content is PPC or PC at the scale and speed required. This means that there is a real risk that misogynistic material, as well as other harmful content which disproportionately impacts girls, will not be meaningfully identified and removed / hidden / downranked.

As Glitch set out in their response to the illegal harms consultation, content moderation approaches should also include gender sensitive policies to support a practical and informed approach to reducing gendered harms against children: "Gender-sensitive policies can help identify and address harmful content targeting women and girls more effectively. Without such policies, there is a risk of overlooking or downplaying gender-based harm in content moderation efforts. Also there is no discussion about the representation of women and girls in content moderation processes. Ensuring diverse representation, including gender diversity, in moderation teams can help identify and address gender-specific issues more effectively, particularly if they are nuanced. The absence of gender-inclusive moderation practices undermines the ability to adequately address the needs of these marginalised groups."

Recommendations on content moderation

- Content moderation approaches should include gender sensitive policies to support a practical and informed approach to reducing gendered harms against children.

Burdens on children

The proposals on user reporting and complaints continue to place the burden on children to provide the evidence for platforms to take action on harmful content. We note that Ofcom is seeking additional evidence in relation to user reporting: we would urge them in this regard to include a measure or recommendation in the codes of practice to use Trusted Flaggers. Trusted Flaggers with expertise in this online VAWG could strengthen reporting systems and ensure the onus is not on children to report harm, which is an unacceptable burden. These programmes have been under-utilised to date, but offer significant potential for strengthening reporting systems, identifying emerging harms and supporting efficient content moderation. There should be more focus on measures to ensure that tech companies are engaging better with support services and making it easier to set up trusted partner channels to take the pressure off the victims of abuse.

While this is out of scope for the current consultation, the UK Government might also learn from recent actions by the Australian Office of the eSafety Commissioner, which promotes online safety education for a variety of communities (e.g., teachers, children's parents, women, seniors) and generally acts as a one-stop shop for any member of the public. A body with similar roles and responsibilities is missing in the UK where citizens lack a streamlined contact point for issues such as online bullying, online hate crime or best practices around cybersecurity.

Recommendations to reduce burdens on children

- The use of trusted flaggers with expertise in online VAWG must be an essential part of the suite of measures required of services in relation to user reporting so that the burdens on children are lessened.
- Ofcom should consider redistributing future income from fines to support the work of VAWG-sector crisis / support orgs, including specialist services.
- As recommended by Glitch and EVAW in response to Ofcom's recent media literacy consultation, obligations on VAWG prevention work for platforms should be included in the codes of practice. This must include platforms funding and resourcing work to engage all children in understanding what online VAWG is via their platforms e.g. defining misogynistic content and why it is harmful/how to report it, or education resources on image based sexual abuse etc. Campaigns, resources and tools that help reduce the perpetration of these harms are essential and platforms should work with experts in online VAWG to develop this work. This is also essential for the connection to domestic abuse, which we flag above as a gap.

Small platforms

As in the OSA Network's full submission, we have noted that some services are subject to more limited obligations because of their size. Some of those obligations are, however, central to safety and a key example of this is guidance and training for moderators - Ofcom notes the difficulties in identifying harms in some context (eg self-harm; eating disorder) and these areas are ones in which the differential impact of harm has been noted. The obligation to train in relation to a topic should relate to the risk in relation to that subject on the particular service - not to the service's size, or how many risks the service faces. (Ofcom notes the evidence previously provided by Glitch on moderator training in gender-based violence at para 16.226.) This should be a base level obligation for all services - and as Ofcom notes, the scale of the job will vary so single risk platforms will have less to do.

Summary of recommendations

In conclusion, we bring together all the recommendations provided in this submission below for ease of reference.

- A more specific focus on VAWG is needed across Ofcom's illegal harms and children's proposals, and the related codes and guidance. This should ensure that regulated services understand the range of relevant content and activities, spanning both the criminal offences and Primary Priority Content and Priority Content, with a clear link to the stronger measures to mitigate the content-related harms. This should be a priority for the development of the VAWG guidance with concrete cross-references included in further iterations of the sets of codes.

- In addition, the gap between the specific risk factors relating to features and functionalities that are evidenced by Ofcom as having relevance to harms against women and girls and the lack of associated mitigating measures in the codes of practice needs to be closed, as recommended in the OSA Network response.

- Reference to misogynistic content should be added to the guidance (section 8.6), (eg the tables at 8.6.2 and 8.6.3) setting out the types of content that are deemed to be abusive or incite hatred to women and girls. A distinction should be made between incitement to hatred and incitement to VAWG.

- The use of trusted flaggers with expertise in online VAWG must be an essential part of the suite of measures required of services in relation to user reporting so that the burdens on children are lessened.

- A measure relating to the creation of fake/multiple accounts needs to be added to the codes of practice.

- The introduction of measures to deliver age-appropriate experiences for children must be expedited.

- Ofcom should consider redistributing future income from fines to support the work of VAWG-sector crisis / support orgs, including specialist services.

- Finally, as recommended by Glitch and EVAW in response to Ofcom's recent media literacy consultation, obligations on VAWG prevention work for platforms should be included in the codes of practice. This must include platforms funding and resourcing work to engage all children in understanding what online VAWG is via their platforms e.g. defining misogynistic content and why it is harmful/how to report it, or education resources on image based sexual abuse etc. Campaigns, resources and tools that help reduce the perpetration of these harms are essential and platforms should work with experts in online VAWG to develop this work. This is also essential for the connection to domestic abuse, which we flag above as a gap.

Respondents

Centre for Protecting Women Online

End Violence Against Women Coalition

5 Rights Foundation

Glitch

NSPCC

Online Safety Act Network

Refuge

Safe Lives

Suzy Lamplugh Trust

UCL Gender and Tech Research Unit

Prof Lorna Woods, University of Essex

Prof Clare McGlynn, University of Durham