

Your response

Question 1: To assist us in categorising responses, please provide a description of your organisation, service or interest in protection of children online.

Is this a confidential response? (select as appropriate)

No

Established in 2005, the End Violence Against Women Coalition (EVAW) is a leading coalition of over 130 specialist women's support services, researchers, activists, survivors, and NGOs working to end violence against women and girls (VAWG) in all its forms including: sexual violence, domestic violence, so-called honour-based abuse, forced marriage, sexual exploitation, FGM, stalking and harassment. We campaign for improved national and local government policy and practice in response to all forms of violence against women and girls, and we challenge the wider cultural attitudes that tolerate violence against women and girls and make excuses for it. We welcome the opportunity to respond to this Ofcom consultation as two critical areas of our campaigning work have been online harms, including the Online Safety Bill and prevention work with children and young people.

Question 2: Can you identify factors which might indicate that a service is likely to attract child users?

Is this a confidential response? (select as appropriate)

No

EVAW will not be responding to this question.

Question 3: What information do services have about the age of users on different platforms (including children)?

Is this a confidential response? (select as appropriate)

No

Question 3: What information do services have about the age of users on different platforms (including children)?

EVAW will not be responding to this question.

Question 4: How can services ensure that children cannot access a service, or a part of it?

Is this a confidential response? (select as appropriate)

No

EVAW will not be responding to this question.

Question 5: What age assurance and age verification or related technologies are currently available to platforms to protect children from harmful content, and what is the impact and cost of using them?

Is this a confidential response? (select as appropriate)

No

EVAW will not be responding to this question.

Question 6: Can you provide any evidence relating to the presence of content that is harmful to children on user-to-user and search services?

Is this a confidential response? (select as appropriate)

No

As an organisation working to end violence against women and girls (VAWG), we are focusing our response on content that has a disproportionate impact on girls as part of a continuum of VAWG which spans across women and girls' lifetimes, and content which upholds the cultural norms and structures which underpin the epidemic of VAWG we see today. As with all forms of VAWG, online abuse is a cause and consequence of women and girls' inequalities and are deeply related to intersecting inequalities based on ethnicity, disability, sexuality and so on – with research showing that 46% of Black and minoritised women and non-binary people have experienced online abuse¹.

This generation of children frequently participates in the online world; as evidenced in the Children's Commissioners Big Summer Survey, 88% use social media alone. Of particular concern are the misogynistic narratives espoused by popular figures online, access to pornography, and the use of platforms as vehicles for forms of VAWG, including taking and sharing girls' intimate images, grooming, coercive control and stalking.

We are deeply concerned by the proliferation of misogynistic ideas to children, often amplified by platforms algorithms, an example of which is content produced and inspired by Andrew Tate's videos that are littered with misogynistic tropes about women and underpin harmful gender stereotypes which impact children's ability to live safe, free and fulfilling lives. The content on these platforms can impact children's offline behaviour, and teachers and education bodies have brought to light how this is dangerously playing out in schools²³. There is evidence to suggest that young boys, in particular, idolise influencers such as Tate, and school children are utilising such content as a replacement for education on topics such as sex⁴. Furthermore, a recent investigation found that video-sharing platforms such as TikTok and Youtube have promoted such content without individuals searching for it⁵.

It is also essential to highlight the easy access to pornography for the current generation of children and young people via user-to-user and search services, and the violent nature of some of this content. For example, a recent Children's Commissioners report showed that

¹ EAW & Glitch (2020), 'The Ripple Effect, COVID-19 and The Epidemic Of Online Abuse', Available online: <https://www.endviolenceagainstwomen.org.uk/wp-content/uploads/Glitch-and-EAW-The-Ripple-Effect-Online-abuse-during-COVID-19-Sept-2020.pdf>

² 'How TikTok bombards young men with misogynistic videos' The Guardian. Available online: <https://www.theguardian.com/technology/2022/aug/06/revealed-how-tiktok-bombards-young-men-with-misogynistic-videos-andrew-tate>

³ 'I'm a teacher – this is what my 15-year-olds are saying about Andrew Tate' The Independent. Available online: <https://www.independent.co.uk/voices/andrew-tate-kids-school-court-case-b2259988.html>

⁴ 'We see misogyny every day': how Andrew Tate's twisted ideology infiltrated British schools, The Guardian. Available online: <https://www.theguardian.com/society/2023/feb/02/andrew-tate-twisted-ideology-infiltrated-british-schools>

⁵ Das, S. (2022). 'Inside the violent, misogynistic world of TikTok's new star, Andrew Tate.' *The Observer*. Available: <https://www.theguardian.com/technology/2022/aug/06/andrew-tate-violent-misogynistic-world-of-tiktok-new-star>

Question 6: Can you provide any evidence relating to the presence of content that is harmful to children on user-to-user and search services?

Twitter was the online platform where young people were most likely to have seen pornography. Furthermore, the report stated that 79% of respondents had encountered violent pornography before the age of 18⁶.

We are seeing user-to-user platforms being used as a vehicle for VAWG, and young girls are bearing the brunt of online harm. This includes the use of such platforms to share girls' intimate images, including a rise in victims having explicit images or videos taken of them without their consent. In a recent EVAW survey, 1 in 4 girls have shared a sexual image of themselves (24%), and of those, a quarter (24%) said they felt pressured into it, and almost a third (31%) initially wanted to but later regretted it⁷. Other research has warned about this as an increasingly normalised practice among young people, for example:

- Refuge's report, *The Naked Threat*, evidenced that 1 in 7 young women have experienced threats to share their intimate images or videos⁸.
- OFSTED's report in June 2021 evidenced that nearly 90% of girls said being sent explicit pictures or videos of things they did not want to see happens a lot or sometimes to them or their peers, and that sharing and sending of explicit images have become 'normalised' in school settings⁹.
- Recent research has highlighted the sharing of explicit images by boys is seen as a 'bonding activity' and is a 'digital trophy' and seen as something young boys aim to aspire to receiving and sending nudes¹⁰.
- A recent report, 'Without Consent', details a range of case studies from girls and young women¹¹ who had images taken of them without their consent, including young people detailing their experiences of images being 'screenshotted' on Snapchat without their consent. This behaviour appears to be increasingly commonplace, with one young participant in the research stating, 'every other week there is someone been leaked on social media'¹².

The use of such platforms being used as a vehicle for VAWG is also evident in cases of grooming. The NSPCC has raised concerns after research revealed 1,200 cases of online

⁶ Children's Commissioner (2023), 'A lot of it is actually just abuse Young people and pornography' Available online: <https://www.childrenscommissioner.gov.uk/wp-content/uploads/2023/02/cc-a-lot-of-it-is-actually-just-abuse-young-people-and-pornography-updated.pdf>

⁷ End Violence Against Women Coalition (2023). Survey: nfpResearch conducted an online survey on behalf of EVAW with 1000 young women and 500 young men aged 16 – 18 between 3rd and 14th November 2022. Results available here: <https://www.endviolenceagainstwomen.org.uk/new-campaign-film-its-about-time-things-changed/>

⁸ Refuge (2020), 'The Naked Threat'. Available online: <https://refuge.org.uk/wp-content/uploads/2020/07/The-Naked-Threat-Report.pdf>

⁹ OFSTED (2021), 'Review of sexual abuse in schools and colleges', Available online: <https://www.gov.uk/government/publications/review-of-sexual-abuse-in-schools-and-colleges/review-of-sexual-abuse-in-schools-and-colleges>

¹⁰ Jessica Ringrose, Kaitlyn Regehr and Betsy Milne (2021), 'Understanding and Combatting Youth Experiences of Image-Based Sexual Harassment and Abuse', Available online: <https://www.ascl.org.uk/ibsha>

¹¹ Participants' ages ranged from 16 to 30, with a focus on experiences of image-based abuse that took place between the ages of 16 and 24.

¹² Revealing Reality (2023) 'Without Consent Exploring image-based abuse in relationships', Available online: https://www.revealingreality.co.uk/wp-content/uploads/2023/02/Without-Consent_Revealing-Reality_27Feb23.pdf

Question 6: Can you provide any evidence relating to the presence of content that is harmful to children on user-to-user and search services?

grooming against children were recorded in just 3 months of lockdown¹³. Platforms owned by Meta were alarmingly used in 38% of cases where communications were recorded in 2021/22. The gendered nature of this abuse is clear, with girls being the target in 82% of the cases in 2021/22¹⁴.

We also see the use of online platforms as vehicles for coercive control and stalking. Findings from SafeLives Young People's Programme showed that young people faced harassment and controlling behaviours, including emotional abuse online¹⁵. Moreover, the Women and Equalities Select Committee's enquiry on sexual harassment and sexual violence in schools detailed how technological advancements were aiding in the online stalking of girls¹⁶.

It is important to note these forms of abuse and harm experienced by girls and young women online. The impact of online misogynist content and exposure to violent pornography for both boys and girls will continue beyond their 18th birthday. As the majority (62%) of young women experience abuse online¹⁷, we are keen to see OFCOM consider how they will manage that cliff edge for young people and provide a safer online space for those 18 to 25 years old and beyond.

Question 7: Can you provide any evidence relating to the impact on children from accessing content that is harmful to them?

Is this a confidential response? (select as appropriate)

No

The harmful content that children are exposed to has far-reaching consequences at an individual and societal level. Women and girls are exposed to a continuum of VAWG across their lifetimes, and the starting point at which they first experience VAWG is happening to them at an earlier age due to the nature of content that infiltrates the online world.

¹³ 'Online grooming crimes have risen by more than 80% in four years', NSPCC Available online: <https://www.nspcc.org.uk/about-us/news-opinion/2022/online-grooming-crimes-rise/>

¹⁴ 'Online grooming crimes have risen by more than 80% in four years', NSPCC Available online: <https://www.nspcc.org.uk/about-us/news-opinion/2022/online-grooming-crimes-rise/>

¹⁵ 'Young people at risk: online intimate abuse and coercive control' SafeLives Available online: https://safelives.org.uk/practice_blog/young-people-risk-online-intimate-abuse-and-coercive-control

¹⁶ House of Commons Women and Equalities Committee (2016) Sexual harassment and sexual violence in schools [online] Available online: https://publications.parliament.uk/pa/cm201617/cmselect/cmwomeq/91/9106.htm#_idTextAnchor026

¹⁷ Refuge (2021) 'Unsocial Spaces' Available online: <https://refuge.org.uk/wp-content/uploads/2022/04/unsocial-spaces-.pdf>

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Impact of gender stereotypes and online misogyny

The plethora of misogynistic content that exists online that boys as young as 12¹⁸, as well as young girls, are exposed to is further entrenching women and girls' inequalities in society. This harmful content frequently depicts women negatively, reinforcing patriarchal beliefs about women and perpetuating harmful ideals of masculinity. It is also important to note that such content frequently contains racist tropes, compounding the impact for Black and minoritised girls. The impact of this exposure to gender norms was highlighted in a recent report - 'The State of UK Boys'. This report highlights how online spaces are cultivating unhealthy norms for young boys, noting how the rise of so-called 'men's rights activism' is encouraging young boys to engage in acts which pose harm to girls in offline and online spaces. It also raises how this harmful content continues to perpetuate intersectional inequalities along the lines of race, class and sexuality¹⁹.

Sexual Abuse and Unhealthy Relationships

Misogynistic influencers (who often promote sexual violence) and pornography are having an impact on what and how young people are learning about sex and relationships²⁰. What we consider to be harmful online content, from the likes of Andrew Tate, is encouraging young boys to act out the behaviour they see discussed online and is promoting 'rape culture'. As stated by a young woman involved in a focus group facilitated by EAW - "When you joke about it you are normalising it...rape jokes are a fluent language to them". Statistics from the government's Prevent review evidenced that more young boys are being impacted by 'incel' ideology and culture²¹. This is further compounded by the exposure of young boys' to pornography that objectifies women and frequently includes violence and non-consensual acts. A reality that children and young people know is affecting their relationships – with 58% of respondents to the Children's Commissioners Big Summer Survey saying that they agreed with the statement 'viewing online pornography affects young people's behaviours towards one another'²²; and with a young person expressing how 'many heterosexual men grow up to have certain expectations of how to treat women when having sex and in general a lot of that is actually just abuse'²³. Furthermore, Professor Claire McGlynn has pointed out that image-based abuse is not only harming the individuals involved but is also causing 'cultural harm' through the promotion of a set of norms and attitudes which minimises how sexual violence is viewed offline²⁴. We are, therefore, increasingly seeing how

¹⁸ 'Vulnerable boys are drawn in': schools fear spread of Andrew Tate's misogyny', The Guardian, Available online: <https://www.theguardian.com/society/2023/jan/07/andrew-tate-misogyny-schools-vulnerable-boys>

¹⁹ Global Boyhood Initiative (2022) 'The State of UK Boys Understanding and Transforming Gender in the Lives of UK Boys' Available online: <https://boyhoodinitiative.org/wp-content/uploads/2022/11/State-of-UK-Boys-Long-Report.pdf>

²⁰ 'Online Safety Commission from Government: Our recommendations for making the online world safer for children', Children's Commissioner, Available online: <https://www.childrenscommissioner.gov.uk/report/online-safety-commission-from-government-our-recommendations-for-making-the-online-world-safer-for-children/>

²¹ William Shawcross 'Independent Review of Prevent', (2023) Available online: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1134986/Independent_Review_of_Prevent.pdf

²² Children's Commissioner (2023), 'Findings from The Big Ask: Children in Care' Available online: <https://www.childrenscommissioner.gov.uk/report/findings-from-the-big-ask-children-in-care/>

²³ Children's Commissioner (2023), 'Findings from The Big Ask: Children in Care' Available online: <https://www.childrenscommissioner.gov.uk/report/findings-from-the-big-ask-children-in-care/>

²⁴ Clare McGlynn (2017), Erika Rackley, 'Image-Based Sexual Abuse', *Oxford Journal of Legal Studies*, Volume 37, Issue 3, Pages 534–561, <https://doi.org/10.1093/ojls/gqw033>

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online norms distort offline behaviour. This is deeply concerning and has grave consequences regarding the continued epidemic of sexual violence and domestic abuse, including the national crisis of sexual harassment in schools, as highlighted by a 2021 Ofsted report²⁵.

Mental Health Impacts

The trauma and mental health impacts of VAWG, including online abuse, are well documented – from depression and anxiety to PTSD and suicidality²⁶. A poll by Amnesty found that between over half to two-thirds of women (55% to 67%) who experienced abuse or harassment on social media platforms stated that they were less able to focus on everyday tasks, had experienced stress, anxiety or panic attacks, and had a feeling of apprehension when thinking about social media or receiving social media notifications²⁷. Although this poll relates to adult women, the findings are very likely to be applicable to girls and young women when considering the evidence on the mental health impacts of social media on children. For example, research from Barnardo's highlighted 1 in 4 girls are depressed due to the over consumption of content from social media²⁸. It is also important to note how intersecting inequalities can compound the mental health impacts of harmful content for marginalised groups^{29,30}.

Restricting girls and young women's freedoms and opportunities

Young girls are commonly compelled to 'come offline' to shrink and censor themselves simply to avoid the consequences of the harm they encounter, and this has wider societal consequences. According to Amnesty, 76% of women who experienced online abuse/harassment made changes to the way they used platforms³¹, which is likely to mirror the experiences of girls. Research by NHS England found that only 56.1% of young girls, compared to 69.8% of boys, feel safe online³². Plan UK has reported that online abuse is leading to young girls being 'dehumanised', and 'being slut-shamed' online³³. This amounts to the shrinking of girls, which has devastating consequences such as restricting girls opportunities, and their access to education, support and information.

²⁵ OFSTED (2021), 'Review of sexual abuse in schools and colleges', Available online: <https://www.gov.uk/government/publications/review-of-sexual-abuse-in-schools-and-colleges/review-of-sexual-abuse-in-schools-and-colleges>

²⁶ Women's Aid. (2021). *Mental health and domestic abuse: A review of the literature*. Available here: <https://www.womensaid.org.uk/mental-health-and-domestic-abuse-a-review-of-the-literature/>

²⁷ Amnesty (2018). #ToxicTwitter. Available online: <https://www.amnesty.org/en/latest/research/2018/03/online-violence-against-women-chapter-1-1/>

²⁸ Barnardo's (2019) 'Left to their own devices' Available online:

<https://www.barnardos.org.uk/sites/default/files/uploads/Executive%20Summary.pdf>

²⁹ Thiara, R and Harrison, C. (2021) *Reframing the links: Black and minoritised women, domestic violence and abuse, and mental health – A review of the literature*. University of Warrick and Women's Aid.

³⁰ Girlguiding (2022) *Girl's Attitudes Survey*. Available online: <https://girlguiding.foleon.com/girls-attitudes-survey/2022-report/>

³¹ Amnesty International (2017), 'Amnesty reveals alarming impact of online abuse against women' Available online: <https://www.amnesty.org/en/latest/press-release/2017/11/amnesty-reveals-alarming-impact-of-online-abuse-against-women/>

³² NHS (2022), 'Mental Health of Children and Young People in England 2022 - wave 3 follow up to the 2017 survey' Available online: <https://digital.nhs.uk/data-and-information/publications/statistical/mental-health-of-children-and-young-people-in-england/2022-follow-up-to-the-2017-survey#>

³³ Plan UK (2023), 'Everything is Racialised on Top'. Available online: <https://plan-uk.org/file/everything-is-racialised-reportpdf/download?token=bVe1kW6->

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Public Services

Harmful content online is a key driver of the epidemic of VAWG in the UK. This epidemic has significant impact on what is needed from public services to keep children and young people safe. We are seeing a national crisis in sexual harassment in schools, and teachers are grappling to respond to this and the growth of online misogyny. It is also important to note the impact on the NHS (for example, the health-related costs of child sexual abuse were estimated to be £183 million in the year ending 2012-2013³⁴), as well as the impact on children's social care, the third sector, and the police (for example, online child sexual abuse cases referred to Thames Valley Police rose by 93% during the lockdown³⁵).

Question 8: How do services currently assess the risk of harm to children in the UK from content that is harmful to them?

Is this a confidential response? (select as appropriate)

No

EVAW will not be responding to this question.

Question 9: What are the exacerbating risk factors services do or should consider which may have an impact on the risk of harm to children in the UK?

Is this a confidential response? (select as appropriate)

No

It is important to stress that online VAWG cannot be separated from offline VAWG and must be seen as a continuum of each other. For example, teenage relationship abuse can include elements of online abuse alongside emotionally controlling behaviour and sexual and physical abuse; therefore, they must be understood as issues that reinforce one another rather than treated as distinctive issues.

³⁴ Survivors In Transition(2023) 'Denial, Disbelief and Delays' Available online:

<https://survivorsintransition.co.uk/wp-content/uploads/2023/01/Focus-on-Survivors-III.pdf>

³⁵ 'Police force sees 93% rise in referrals of online child sexual abuse cases' Evening Standard

Available online: <https://www.standard.co.uk/news/uk/thames-valley-police-national-crime-agency-bracknell-b927172.html>

Question 9: What are the exacerbating risk factors services do or should consider which may have an impact on the risk of harm to children in the UK?

The way platforms are designed creates conducive contexts for proliferating VAWG and does little to manage, and often increases, the risks to children. In a recent report, *Monetising Misogyny*, it was highlighted how algorithms are boosting and amplifying harmful content, and 'recommender features' that are built in, are designed to ensure the information 'sticks' on the app and is widely circulated³⁶. A whistle-blower from Facebook has publicly spoken out about how Facebook avoids making the site safer as it will make less money³⁷. It is well evidenced that the profit-making focus of the tech companies in charge of these platforms is a critical exacerbating risk factor when it comes to preventing online harms for children.

Services should also consider how inequalities on the basis of gender, race, disability, social class, and sexuality intersect and impact a child's risk and experience of online VAWG, as well as their ability to access support. It is integral that any solutions are considered with an intersectional lens to ensure no child slips through gaps. This starts with recognising the disproportionality of online harms for those that face different forms of oppression and marginalisation. Evidence from a survey by Galop in 2020 about the experiences of the LGBT+ community highlighted that 5 in 10 respondents had experienced online abuse 10 or more times³⁸. We have also seen online hate crimes reported by disabled people increase - 20.4% higher in 201/22 than in 2020/21³⁹. Furthermore, research conducted by Amnesty International found that Black women were 84% more likely to be abused online than white women⁴⁰. Offline hate crimes have increased for people with protected characteristics, which reflects how harmful content is infiltrating people's attitudes and normalising a culture of abuse. It is also important to note how intersecting inequalities impacts children's and young people's access to support. Research by Plan UK highlights the lack of support networks for Black and minoritised children to speak openly about the sexual harassment they face⁴¹. As a result, many young girls are often left feeling isolated and alone. Specialist services are a lifeline for girls to discuss their experiences of abuse and harassment; however, due to chronic underfunding, there is a lack of specialist 'by and for' services to support young girls from minoritised groups⁴².

³⁶ Lucinda Di Meco (2023) *'Monetizing Misogyny Gendered Disinformation and the Undermining of Women's Rights and Democracy Globally'*, Available online: https://she-persisted.org/wp-content/uploads/2023/02/ShePersisted_MonetizingMisogyny.pdf

³⁷ *'Facebook putting profit before public good, says whistleblower Frances Haugen'* *The Guardian*. Available online: <https://www.theguardian.com/technology/2021/oct/03/former-facebook-employee-frances-haugen-identifies-herself-as-whistleblower>

³⁸ Galop (2020) *'Online Hate Crime Report'*. Available online: https://galop.org.uk/wp-content/uploads/2021/06/Online-Crime-2020_0.pdf

³⁹ Leonard Cheshire (2022), *'Say No to Disability Hate Crime Disability hate crime in the UK – and how we can work together to mitigate its impact'*. Available online: <https://leonardcheshire.org/sites/default/files/2022-10/Disability-Hate-Crime-Report-2022-reduced.pdf>

⁴⁰ Amnesty (2018), *'Troll Patrol Findings'*, Available online: <https://decoders.amnesty.org/projects/troll-patrol/findings>

⁴¹ Plan UK (2023), *'Everything is Racialised on Top'*. Available online: <https://plan-uk.org/file/everything-is-racialised-reportpdf/download?token=bVe1kW6->

⁴² Domestic Abuse Commissioner (2022), *Mapping of Domestic Abuse across England and Wales*, Available online: <https://domesticabusecommissioner.uk/wp-content/uploads/2022/06/DAC-Mapping-Briefing-Paper-05.pdf>

Question 10: What are the governance, accountability and decision-making structures for child user and platform safety?

Is this a confidential response? (select as appropriate)

No

EVAW will not be responding to this question.

Question 11: What can providers of online services do to enhance the clarity and accessibility of terms of service and public policy statements for children (including children of different ages)?

Is this a confidential response? (select as appropriate)

No

EVAW will not be responding to this question.

Question 12: How do terms of service or public policy statements treat 'primary priority' and 'priority' harmful content?⁴³

Is this a confidential response? (select as appropriate)

No

EVAW will not be responding to this question.

⁴³ See A1.2 to A1.3 of the call for evidence for more information on the indicative list of harms to children.

Question 13: What can providers of online services do to enhance children's accessibility and awareness of reporting and complaints mechanisms?

Is this a confidential response? (select as appropriate)

No

EVAW will not be responding to this question.

Question 14: Can you provide any evidence or information about the best practices for accurate reporting and/or complaints mechanisms in place for legal content that is harmful to children, or users who post this content, and how these processes are designed and maintained?

Is this a confidential response? (select as appropriate)

No

EVAW will not be responding to this question.

Question 15: What actions do or should services take in response to reports or complaints about online content harmful to children (including complaints from children)?

Is this a confidential response? (select as appropriate)

No

As outlined in our [VAWG Code of Practise](#)⁴⁴ - complaints processes provide vital early warning of VAWG problems on a service, as well as a mechanism to deal with a problem

⁴⁴ EVAW Glitch, Refuge, 5Rights, NSPCC, Carnegie UK and Professors Clare McGlynn and Lorna Woods (2022), 'Violence Against Women and Girls (VAWG) Code of Practice' Available online: <https://www.endviolenceagainstwomen.org.uk/wp-content/uploads/2022/05/VAWG-Code-of-Practice-16.05.22-Final.pdf>.

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in an individual case. The adequacy of complaints processes should be part of the risk assessment. The provider should also ensure that the design of complaints mechanisms is user-centric: that is, visible, easy to use and age and language appropriate. Complaints processes should not just be limited to complaints about individual items of content. They should allow for complaints about a series or pattern of communications as well as features of the services itself (for example, the way the recommender algorithm works or other 'dark patterns'⁴⁷ and nudges or tools for creation). The regulator must regularly assess whether such processes are fit for purpose. Regulated services must work to identify trends and developments in user reporting and incorporate this in any transparency reporting obligations to the regulator.

Good practice in responding to VAWG content that is flagged to an online service might include the following:

- all platforms must acknowledge reports within 24 hours. Reports must be actioned within a specific time frame set and published by the provider in their Terms of Service and in response to a report made (this may vary dependent on harm reported);
- data should be gathered on response times to ensure these commitments are met;
- companies should track where multiple reports are made by an individual, as this may indicate increased risk of harm;
- victims must be able to provide the username of the perpetrator rather than reporting individual pieces of content;
- reporting avenues should be provided for non-users to flag harmful content;
- users should have access to clear flagging processes that identify whether their issues are VAWG related as well intersecting with other types of abuse such as racist, homophobic abuse. This is in addition to more specific flagging categories to triage and escalates risk;
- consideration must be given to the accessibility of flagging and reporting for younger users who may not be conscious of VAWG dynamics impacting their case;
- regulated services must use the intelligence from the report or flag to prioritise its human and automated content moderation;
- in the case where content, which has had a determination by automated technology, is continuing to be flagged or reported, it must be assessed by a human moderator;
- there must be an appropriate number of VAWG-trained human moderators, taking into account the scale of any VAWG problem on the service;
- human moderators must be supported in a holistic manner which recognises the psychological impact of the work;
- harmful content or actions which have been flagged as having gendered nature must be expedited and considered by moderators with VAWG and child protection expertise;
- regulated services must explain the outcome of a report or flag in clear and simple language, outline a user's right to appeal and explain the steps a user must take if they do not agree with the determination; and
- recommender algorithms must consider content that has been recently flagged or reported and limit its spread until the content has been reviewed.

Question 15: What actions do or should services take in response to reports or complaints about online content harmful to children (including complaints from children)?

This Guideline should be considered in line with Guideline 6 on Moderation in our VAWG Code of Practice.

Question 16: What functionalities or features currently exist that are designed to prevent or mitigate the risk or impact of content that is harmful to children? A1.21 in the call for evidence provides some examples of functionalities.

Is this a confidential response? (select as appropriate)

No

Various features and functionalities can mitigate the risk or impact of harmful content on children, such as age verification. Our VAWG Code of Practice sets a series of functionalities and features designed to prevent and mitigate harmful content, this includes outlining how companies must ensure and be able to demonstrate their systems are safe by design, including addressing the following concerns:

- Taking an appropriate and proportionate approach to the principle of knowing your client [KYC] to address VAWG harms spread by those using multiple, false, or anonymous identities.
- Ensuring that young users' settings are set to safety by default.
- Ensuring algorithms used on the service do not cause foreseeable harm through promoting hateful content, for example, by rewarding misogynistic influencers with greater reach, causing harm both by increasing reach and engagement with a content item.
- That speed of transmission has been considered, for example, methods to reduce the velocity at which intimate images can be non-consensually shared and, therefore, the risk of cross-platform contamination.
- Actors cannot take advantage of new or emerging tools to cause harms to women and girls. For instance – – deep fake or audio-visual manipulation materials. – nudification technology. – bots and bot networks. – content embedded from other platforms and synthetic features such as gifs, emojis, hashtag. – other new technology
- Consideration of the circumstances in which targeted advertising may be used and oversight over the characteristics by which audiences are segmented.
- Account security systems which enable survivors of abuse who are hacked and locked out to recover their accounts.

Question 16: What functionalities or features currently exist that are designed to prevent or mitigate the risk or impact of content that is harmful to children? A1.21 in the call for evidence provides some examples of functionalities.

- Systems for cross-platform cooperation to ensure knowledge about forms of offending that may present a foreseeable risk of harm in relation to attacks of those with protected characteristics. (
- Use of tools including, but not limited to, prompts which clarify or suggest an individual's intended search.
- Policies concerning advertising sales in respect of promoting harmful content or for malicious intent in respect of those with protected characteristics.

Question 17: To what extent does or can a service adopt functionalities or features, designed to mitigate the risk or impact of content that is harmful to children on that service?

Is this a confidential response? (select as appropriate)

No

Please see answer to above question.

Question 18: How can services support the safety and wellbeing of UK child users as regards to content that is harmful to them?

Is this a confidential response? (select as appropriate)

No

Services must ensure that their platforms are future proofed when considering preventing online harm. 'Safety by design' is essential, as this approach requires services to analyse their products from the view of how they could be used to enact harm and ensure services are looking towards preventing online harm and not solely focused on how to remove harmful content.

Additionally, services should consider how they can foster collaborative working relationships with the specialist VAWG sector. The VAWG sector is best placed to offer their expertise on how platforms are being used as vehicles to perpetrate abuse and how services can ensure their platforms are safe and secure for girls and young women.

Question 18: How can services support the safety and wellbeing of UK child users as regards to content that is harmful to them?

EVAW, in collaboration with a coalition of organisations: Glitch, Refuge, 5Rights, NSPCC, Carnegie UK and Professors Clare McGlynn and Lorna Woods, have developed a VAWG 'Code of Practice' which makes a range of suggestions to support the safety and wellbeing online. To read more, see here: <https://www.endviolenceagainstwomen.org.uk/wp-content/uploads/2022/05/VAWG-Code-of-Practice-16.05.22-Final.pdf>

Question 19: With reference to content that is harmful to children, how can a service mitigate any risks to children posed by the design of algorithms that support the function of the service (e.g. search engines, or social and content recommender systems)?

Is this a confidential response? (select as appropriate)

No

EVAW will not be responding to this question.

Question 20: Could improvements be made to content moderation to deliver greater protection for children, without unduly restricting user activity? If so, what?

Is this a confidential response? (select as appropriate)

No

All services must consider how inadequate moderation is worsening the nature of online harm and further exacerbating the issues that aggravate the impacts for young girls and women. In addition, there must be a greater degree of responsibility placed on services to ensure their moderation is fit for purpose and keeps young women and girls safe online.

In our VAWG Code of Practise, we outline a number of key points in regard to moderation:

- Regulated services must have in place sufficient numbers of moderators, proportionate to the online service size and growth and to the risk of harm, who are able to review VAWG content. This may include moderators who work exclusively on VAWG issues.

Question 20: Could improvements be made to content moderation to deliver greater protection for children, without unduly restricting user activity? If so, what?

- Regulated services must put in place appropriate, updated education and training on VAWG for all staff and subcontractors involved in the content production and distribution chain. This includes senior executives, designers, developers, engineers, customer support and moderators, designed in consultation with independent VAWG experts. The moderators must be appropriately trained, supported and safeguarded.
- Regulated services must consider assigning moderators to specific types of VAWG content to ensure the correct moderators, trained in their specialist subjects and on related language and cultural context considerations, are able to review the content in a consistent fashion.
- Regulated services must have in place processes to ensure that where machine learning and artificial intelligence tools are used, they operate in a non-discriminatory manner and that they are designed in such a way that their decisions are explainable and auditable. For instance, technology to remove sexualised pictures must not remove photos of breastfeeding. A platform provider should consider the way in which AI and machine learning systems and/ or human moderators will distinguish between hateful and harmful content, reclaimed terms used by particular groups, and that of 'counter speech', minimising the risk of blocking or limiting legitimate use of terms within certain online communities and counter speech.
- Users must be informed of the use of such automated tools. Machine learning and artificial intelligence tools cannot wholly replace human review and oversight.
- If the VAWG content involves a person protected by UK law, regulated services must review the content taking into account the terms of service and UK law.
- Regulated services must have clear timeframes for action against flagged content, in line with the good practice outlined in the previous section. Awareness begins at the time flagged content, by means of email, in-platform notification, or any other method of communication, is received.
- Regulated services must act proportionate to risk on content which is not deemed to be illegal but is considered to break their Terms of Service, Community Guidelines or is considered a new form of VAWG as soon as it is identified. Acceptable actions on a piece of content which violates a provider's Terms of Service can include – (a) removal of content; (b) labelling as inaccurate/misleading/contrary to the rules; (c) demonetise content; (d) suppress content in recommender tools; (e) termination of account; (f) suspension of an account;

Question 21: What automated, or partially automated, moderation systems are currently available (or in development) for content that is harmful to children?

Is this a confidential response? (select as appropriate)

No

Question 21: What automated, or partially automated, moderation systems are currently available (or in development) for content that is harmful to children?

EVAW will not be responding to this question.

Question 22: How are human moderators used to identify and assess content that is harmful to children?

Is this a confidential response? (select as appropriate)

No

EVAW will not be responding to this question.

Question 23: What training and support is or should be provided to moderators?

Is this a confidential response? (select as appropriate)

No

Regulated services must put in place appropriate, updated education and training on VAWG for all staff and subcontractors involved in the content production and distribution chain. This includes senior executives, designers, developers, engineers, customer support and moderators.

It is essential that moderators on social media platforms are able to identify and understand all forms of violence against women and girls and the associated dynamics and risks. Moderators should be equipped to understand the impact of intersectionality on different victims and survivors experiences and how different forms of VAWG intersect and are not just singular issues. Additionally, moderators need to understand how problematic and discriminatory attitudes and cultural norms about gender and marginalised identities create conducive contexts for VAWG and other forms of abuse which impact children. Specialist training must be designed in consultation with independent VAWG experts who have the necessary expertise, are grounded in the experiences of victims and survivors, and take an intersectional and holistic approach. It is also important that moderators have the necessary training in child protection and that they are supported in a holistic manner which recognises the psychological impact of the work.

Question 23: What training and support is or should be provided to moderators?

Question 24: How do human moderators and automated systems work together, and what is their relative scale? How should services guard against automation bias?

Is this a confidential response? (select as appropriate)

No

EVAW will not be responding to this question.

Question 25: In what instances is content that is harmful to children, that is in contravention of terms and conditions, removed from a service or the part of a service that children can access?

Is this a confidential response? (select as appropriate)

No

EVAW will not be responding to this question.

Question 26: What other mitigations do services currently have to protect children from harmful content?

Is this a confidential response? (select as appropriate)

No

EVAW will not be responding to this question.

Question 27: Where children attempt to circumvent mitigations in place on a service, what further systems and processes can a service put in place to protect children?

Is this a confidential response? (select as appropriate)

No

We are concerned about how realistic it is to divide the vast online world into spaces which are and are not accessible to children, particularly in light of the speed in which things change and how innovative young people can be to circumvent mitigations in place. It is also, again, important to note the forms of abuse and harm experienced by girls online, and the impact of the promotion of misogynistic beliefs for both boys and girls will continue beyond their 18th birthday. With this in mind, we are keen to see actions that are seeking to create a safer online space for all, which is why we are calling on a mandated VAWG Code of Practice in the Online Safety Bill⁴⁵. Examples of systems and processes that can be put in place to protect children (and all online users) are outlined in this document.

Question 28: Other than those covered above in this document (the call for evidence), are you aware of other measures available for mitigating the risk, and impact of, harm from content that is harmful to children?

Is this a confidential response? (select as appropriate)

No

⁴⁵ EVAW Glitch, Refuge, 5Rights, NSPCC, Carnegie UK and Professors Clare McGlynn and Lorna Woods (2022), 'Violence Against Women and Girls (VAWG) Code of Practice' Available online: <https://www.endviolenceagainstwomen.org.uk/wp-content/uploads/2022/05/VAWG-Code-of-Practice-16.05.22-Final.pdf>.

Question 28: Other than those covered above in this document (the call for evidence), are you aware of other measures available for mitigating the risk, and impact of, harm from content that is harmful to children?

Please reference to our VAWG [Code of Practice](#) which has been jointly produced in collaboration with a coalition of organisations: Glitch, Refuge, 5Rights, NSPCC, Carnegie UK and Professors Clare McGlynn and Lorna Woods