



Consultation response form

Your response

Question	Your response
<p>Question 1: Do you have any comments on our proposed approach to 'content and activity' which 'disproportionately affects women and girls'?</p>	<p>Confidential? –N</p> <p>Parity welcomes the opportunity to respond to this important consultation. We support efforts to make the online world safer for all users, including women and girls. However, we are deeply concerned that Ofcom's proposed approach, as outlined in this consultation and its annex, is currently discriminatory, unbalanced, and inconsistent with statutory duties under equality and human rights law.</p> <p>1. Unfounded Assumption of Disproportionate Harm to Women and Girls</p> <p>The consultation starts from the presumption that online harms disproportionately affect women and girls. Yet Ofcom's own data does not support this:</p> <ul style="list-style-type: none">• Ofcom's 2022 report states: <i>"Overall, men are more likely than women to have experienced potentially harmful online behaviour or content (64% vs 60%)."</i>• This was reaffirmed in Ofcom's 2024 <i>One Nation</i> report (Fig. 63): <i>"Men were more likely than women to have experienced potentially harmful online behaviour in the past 4 weeks (69% vs 66%)."</i> <p>Such findings demonstrate that the male experience of online harm is far from negligible and in many cases greater than that of women and girls. The exclusive focus on women and girls creates a false narrative of</p>

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	<p>gendered victimisation and ignores significant evidence of harm to men and boys.</p> <p>2. Misrepresentation and Misuse of Definitions (e.g. Misogyny)</p> <p>The annex defines "online misogyny" circularly, referring to content that "normalises, encourages, or cements misogynistic ideas". In the main document, Footnote 18 aligns misogyny with "hatred of women" but then loosely associates this with criticism of feminism or gender-related discourse.</p> <p>This is problematic for several reasons:</p> <ul style="list-style-type: none"> • Misogyny is not clearly defined in a way that can be operationalised without risk to legitimate free expression. • The equivalent concept of misandry is not even acknowledged, despite being the counterpart under the umbrella of sexism. • There is a risk of censoring legitimate political speech, including criticism of feminism, which may be conflated with misogyny by some observers. <p>If Ofcom sets standards that treat the expression of certain beliefs as inherently harmful without proper definition and procedural safeguards, this could result in the de facto policing of opinion, not just behaviour—a step incompatible with democratic norms and the rights protected under the Human Rights Act and the Online Safety Act.</p> <p>3. Evidence of Harms to Men and Boys in Ofcom's Key Categories</p> <p>Even in the categories Ofcom has identified as quintessentially affecting women and girls, men and boys are often as or more affected:</p> <ul style="list-style-type: none"> • Intimate image abuse and sextortion: Males represent the overwhelming majority of sextortion victims:

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	<ul style="list-style-type: none"> ○ Around 90% according to the UK's National Crime Agency (2024) ○ Similar findings are reported in Australia, where 59% of image-based abuse reports were from males (eSafety Commissioner, eSC website 26/10/22). <ul style="list-style-type: none"> ● Online harassment and pile-ons: Pew Research (2021) found men more likely than women to report online harassment (43% vs 38%), including physical threats (16% vs 11%) and offensive name-calling (35% vs 26%). Ofcom's own 2024 data suggests pile-ons are experienced more often by men (20%) than women (15%). https://www.pewresearch.org/internet/2021/01/13/the-state-of-online-harassment/ ● Domestic abuse: ONS data from March 2025 shows 1.5 million male victims of domestic abuse, approximately 40% of the total, yet only 27% of domestic abuse-related crimes recorded by police involve male victims. This underreporting suggests systemic bias and stigma which Ofcom must consider. ● Risks to journalists: Men make up the vast majority of murdered journalists globally (around 90%, IFJ data, 2024), and harassment patterns vary by subcategory but largely balance across genders (Thurman et al., 2025). <p>These findings strongly suggest that Ofcom's methodology for identifying disproportionately affected groups is flawed. Without rigorous comparative data and input from diverse representative organisations, policy is being developed within an ideological echo chamber, to the detriment of men and boys.</p> <p>4. Legal and Ethical Requirements for Equality and Fairness</p> <p>Under the Equality Act 2010, particularly Sections 13 and 29, and Article 14 of the European Convention on Human Rights, public authorities must not discriminate</p>

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	<p>on the basis of sex. This includes indirect discrimination, such as failure to provide equal protection or consideration.</p> <p>Ofcom’s gender-specific proposals—including some of the actions and “good practice steps” outlined in the consultation—appear to favour women and girls while failing to consider or respond to equivalent harms experienced by men and boys. This would constitute:</p> <ul style="list-style-type: none"> • A discriminatory service in breach of public sector equality duties. • A violation of the requirement for proportionality and fairness in balancing safety and rights under Section 22 of the Online Safety Act. • A potential infringement of rights to freedom of expression and privacy, unless justified by evidence-based analysis—which is currently absent. <p>A declaration of compatibility with the European Convention on Human Rights (e.g. A2.10) cannot replace a robust comparative impact assessment.</p> <p>5. Recommendations for a Lawful and Inclusive Approach</p> <p>Parity urges Ofcom to amend its approach as follows:</p> <ol style="list-style-type: none"> 1. Consult with organisations supporting / representing men and boys, as well as those with a critical or alternative perspective on gender issues, to ensure inclusive policy development. 2. Use comparative, disaggregated data to identify groups disproportionately affected by harm—accounting for underreporting and reporting biases by sex. 3. Where harm is identified (e.g. domestic abuse, online harassment), ensure all victims are equally protected, regardless of sex.

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	<p>4. Clarify key definitions, especially those with ideological overtones (e.g. misogyny), to avoid misuse or overreach and protect lawful expression.</p> <p>5. Ensure that all guidance and proposed actions balance safety with rights to free expression and privacy, as required under domestic and international law.</p> <p>In conclusion, while the goal of a safer internet is commendable, this must be achieved through inclusive, balanced, and evidence-based regulation. Anything less risks embedding sex discrimination into online safety frameworks, undermining both public trust and legal compliance.</p> <p>Parity is ready and willing to assist Ofcom in developing a more equal and robust approach to online safety that protects all users—regardless of sex.</p>
<p>Question 2: Do you have any comments on the nine proposed actions? Please provide evidence to support your answer.</p>	<p>Confidential? –N</p> <p>We have significant concerns with the framing and implementation of several of the nine proposed actions, particularly regarding the omission of harms to men and boys. Gender-based harms are not exclusive to women and girls. Misandry and the abuse of men and boys online are real and growing issues, and they deserve equal recognition and protection under the law.</p> <p>Action 1 – Governance and Accountability processes address online gender-based harms</p> <p>This action must explicitly include gender-based harms against men and boys. Misandry is a well-documented social phenomenon and should not be overlooked in regulatory efforts. Excluding male victims would risk breaching the UK’s legal obligations under the Equality Act 2010, the Sex Discrimination Act, and the Human Rights Act, which require public bodies like Ofcom to exercise their duties without discrimination.</p> <p>Action 2 – Conduct risk assessments that focus on harms experienced by different user groups</p>

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	<p>Risk assessments must incorporate the experiences of men and boys. To fail to do so would result in a systemic blind spot that both providers and Ofcom would be accountable for. A female-only harm model would lead to discriminatory services and breach Ofcom’s duties as a public authority.</p> <p>Action 3 – Transparency</p> <p>If reporting and transparency mechanisms fail to acknowledge harms to men and boys, public trust in Ofcom will erode—among not just male users but across society, including the families, friends, and communities around them. Gender balance in transparency is vital to institutional credibility and fairness.</p> <p>Action 5 – Set safer defaults</p> <p>We support this action in principle where it is genuinely gender-neutral and enhances user safety without compromising user autonomy. However, there should be caution regarding measures that require additional personal data to access accounts, as these could disproportionately infringe on privacy rights.</p> <p>Action 6 – Reduce the circulation of content depicting, promoting, or encouraging online gender-based harms</p> <p>We oppose this action as currently proposed. The threshold for what constitutes a "gender-based harm" is vague and risks being defined in overly broad or ideologically skewed terms. Material that some may find objectionable is not necessarily harmful or illegal. Attempts to curtail such content could amount to unjustified censorship and infringe on freedom of expression, especially when misapplied to gender-critical or satirical speech. Ofcom already possesses powers under its illegal content and child protection frameworks; adding further layers without clear justification is disproportionate.</p> <p>Action 7 – Give users better control over their online experiences</p> <p>We support this in principle as long as the implementation is gender-neutral and does not</p>

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	<p>stigmatise or restrict those who choose not to engage in maximum content filtering. It is essential that such tools empower users without pressuring conformity, which could chill lawful and diverse expression online.</p> <p>Action 8 – Enable users who experience online gender-based harms to make reports</p> <p>We are concerned that an uncritical or overly broad interpretation of what constitutes a "gender-based harm" will lead to widespread misuse of reporting tools. Conflating subjective offence with actual harm can encourage frivolous or ideological complaints, fostering censorship rather than safety. The UK does not—and should not—offer a general right not to be offended, and this principle must be preserved in any gender-based harm framework.</p> <p>Action 9 – Take appropriate action when online gender-based harms occur</p> <p>For the reasons stated above, we oppose this action as proposed. The existing regulatory and legal framework already empowers action against illegal and harmful conduct. Introducing new enforcement triggers based on ambiguous or politicised definitions of "gender-based harms" risks overreach, inconsistency, and legal challenge.</p> <p>Summary</p> <p>While we support efforts to address genuine online harms, the current proposals suffer from a narrow and potentially discriminatory definition of gender-based harm. For this framework to be lawful, proportionate, and effective, it must:</p> <ul style="list-style-type: none"> • Recognise and include male victims of online abuse, • Avoid vague or ideological definitions of harm, • Protect free expression alongside user safety. <p>Without these safeguards, the proposals risk undermining public trust, fairness, and legality.</p>

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<p>Question 3: Do you have any comments about the effectiveness, applicability or risks of the good practice steps or associated case studies we have highlighted in Chapter 3, 4 and 5? Are there any additional examples of good practices we should consider? Please provide evidence to support your comment.</p>	<p>Confidential? –N</p> <p>We have substantial concerns about the effectiveness, applicability, and risks associated with the good practice steps and case studies outlined in Chapters 3, 4, and 5. These concerns centre on evidence quality, gender bias, and freedom of expression risks, which undermine the legitimacy and broader relevance of the guidance.</p> <p>1. Gender Bias in Framing and Implementation</p> <p>While Ofcom is mandated to identify harms that disproportionately affect women and girls, the guidance must not exclude or overlook harms experienced by men and boys, or other gender identities. To do so introduces the risk of institutional sex discrimination, which may violate the Equality Act 2010 and undermine public trust.</p> <p>Case studies in Chapter 5, such as those highlighting Bumble, Glitch, and Women’s Aid, are exclusively focused on female victims. These examples:</p> <ul style="list-style-type: none"> • Fail to acknowledge gender-neutral safety tools applicable to all users. • Ignore the growing evidence of online harms disproportionately or uniquely affecting men and boys – such as misandry, false allegations, sexual extortion, and online abuse of male survivors of domestic violence. <p>By centring one gender while excluding others, the guidance implicitly communicates that certain users' harms are more valid than others', creating a systemic bias that undermines the stated goal of equitable protection.</p> <p>2. Limited Applicability Due to Weak Evidence Base</p> <p>The good practice steps rely heavily on qualitative and anecdotal evidence, often from advocacy-based stakeholder engagement. While lived experience is valuable, the approach suffers from several limitations:</p> <ul style="list-style-type: none"> • Lack of representative data: There is no robust comparative analysis by gender, age, or platform

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	<p>type. Without this, it's impossible to know which groups are most affected and which practices are truly effective.</p> <ul style="list-style-type: none"> • Narrow platform focus: Many case studies centre on dating apps or advocacy-focused platforms. These environments may not reflect dynamics on general-purpose platforms like YouTube, Reddit, or Discord, where abuse behaviours and reporting patterns differ substantially. <p>These limitations render the guidance of questionable value for larger or more diverse platforms and may even mislead providers into applying narrowly framed interventions that do not generalise well.</p> <p>3. Risks to Freedom of Expression and Fairness</p> <p>Several of the “good practice” examples promote automated content moderation, proactive takedowns, and design-level filtration, yet fail to offer sufficient safeguards for due process or clarity on enforcement standards. The following risks arise:</p> <ul style="list-style-type: none"> • Mischaracterisation of dissenting views on gender, abuse, or policy debates as “gender-based harms.” • Censorship of controversial but lawful content, disproportionately affecting men or gender-critical voices. • Lack of transparency around what qualifies as “harm,” leading to subjective or ideologically motivated enforcement. <p>In the absence of strong procedural protections, such as user appeals, clear definitions, and transparent moderation logs, the practices risk fostering a copyright-prone environment and may actively harm free speech and equality under the law.</p> <p>4. Additional Good Practices for Consideration</p>

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	<p>To enhance both fairness and effectiveness, we recommend Ofcom consider a broader and more inclusive range of examples:</p> <ul style="list-style-type: none"> • Gender-neutral safety design: Platforms like Reddit and Discord implement keyword filters, moderation logs, and user-driven community governance. These tools protect all users without gendered presumptions and support diverse online communities. • Support for male victims: Services such as Men’s Advice Line (UK) and 1in6.org (US) provide critical support to male survivors of abuse, a group often underrepresented in policy discussions. Their frameworks could guide more inclusive online safety strategies. • Balanced stakeholder engagement: Effective regulation must involve diverse gender perspectives. Over-reliance on female-focused advocacy organisations risks institutional blind spots and a skewed evidence base. Good practice should reflect the full spectrum of online harms and those affected by them. <p>Conclusion</p> <p>While we recognise the intent behind the proposed good practices, they currently suffer from narrow framing, limited evidence, and ideological bias. As such, they are unlikely to be widely effective or legally sustainable. We urge Ofcom to:</p> <ul style="list-style-type: none"> • Expand its focus to include all genders, • Ground guidance in comparative, empirical evidence, and • Uphold free expression and fairness through clearer definitions and procedural safeguards. <p>This would result in more equitable, effective, and trusted regulation.</p>

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<p>Question 4: Do you have any feedback on our approach to encouraging providers to follow this guidance, including our proposal to publishing an assessment of how providers are addressing women and girls' safety? Do you have any examples or suggestions of other ways we could encourage providers to take up the 'good practice' recommendations?</p>	<p>Confidential? –N</p> <p>We have significant concerns about Ofcom's proposed approach to encouraging compliance with this guidance—particularly the proposal to publicly assess how providers are addressing the safety of women and girls. While transparency and accountability are important, the current framing risks creating regulatory imbalance, reputational coercion, and potentially indirect discrimination. Below, we outline our concerns and suggest alternative, constructive approaches.</p> <p>1. Risk of Regulatory Imbalance and Reputational Pressure</p> <p>Ofcom's proposal to publish assessments focused exclusively on providers' efforts to protect women and girls raises serious concerns regarding fairness, proportionality, and equal treatment under law. We note that Section 54 of the Online Safety Act does not confer explicit authority to publish gender-specific public assessments, and that such an approach may contravene the Public Sector Equality Duty (PSED) by failing to consider all protected groups.</p> <p>More specifically:</p> <ul style="list-style-type: none"> • A singular focus on one demographic may create perverse incentives, whereby platforms feel compelled to align with gender-specific frameworks—not because they are the most effective, but to avoid negative public reporting. • This could unfairly penalise providers that adopt gender-neutral or inclusive safety models, or those that prioritise user safety based on objective risk rather than identity. • The lack of corresponding assessments on how providers support men, boys, non-binary users, or other vulnerable groups introduces an imbalance in public accountability and risks entrenching an unevidenced hierarchy of harm. <p>As a public body, Ofcom must take care not to incentivise indirect discrimination by promoting</p>

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	<p>compliance models that disadvantage certain groups or principles of equal treatment.</p> <p>2. Need for Transparent and Balanced Evaluation Criteria</p> <p>If Ofcom proceeds with publishing provider assessments, several safeguards are necessary to preserve trust and legitimacy:</p> <ul style="list-style-type: none"> • Clear, evidence-based criteria must be developed in advance and shared transparently with providers. • Assessments should measure overall effectiveness in reducing harm, not simply alignment with gender-specific narratives or advocacy language. • Evaluation should be context-sensitive, recognising the differences in platform type, user demographics, scale, and harm profiles. • There must be opportunities for providers to respond to and contextualise assessments before public release, in line with natural justice. <p>Absent these protections, there is a risk that Ofcom’s approach could be perceived as arbitrary or ideologically driven, undermining confidence in both the regulator and the wider Online Safety regime.</p> <p>3. Alternative and Supplementary Approaches to Encourage Good Practice</p> <p>Rather than relying on reputational pressure alone, Ofcom should consider a broader and more constructive toolkit to encourage adoption of inclusive and effective safety practices. We propose the following:</p> <ul style="list-style-type: none"> • Highlight innovation and inclusivity: Showcase platforms that develop user-led safety tools that are effective across gender, age, and harm types. For example, moderation systems that are transparent, user-controllable, or based on harm severity rather than identity labels.

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	<ul style="list-style-type: none"> • Support smaller providers: Offer voluntary toolkits, design templates, and capacity-building workshops co-created with a diverse range of stakeholders—including groups supporting men, boys, LGBTQ+ users, and others underrepresented in current case studies. • Promote data transparency: Encourage platforms to publish disaggregated harm data (by gender, age, platform role, etc.) to inform better policy and support inclusive safety strategies. • Facilitate peer learning: Create neutral forums for providers to share practices, challenges, and lessons learned, without the reputational risks associated with public rankings. This supports honest reporting and ongoing innovation over box-ticking. <p>Conclusion</p> <p>While transparency and accountability are vital, the current proposal to publish provider assessments exclusively regarding women and girls’ safety risks creating a partial and potentially discriminatory framework. We urge Ofcom to:</p> <ul style="list-style-type: none"> • Broaden its assessment approach to reflect the diversity of online harms and affected groups. • Ensure that all evaluative criteria are transparent, evidence-led, and proportionate. • Adopt positive, inclusive incentives that encourage genuine safety innovation across all user demographics. <p>This would enhance the credibility of the Online Safety regime, ensure compliance is grounded in fairness and legality, and reinforce Ofcom’s role as an impartial and effective regulator.</p>
<p>Question 5: Do you have any comments on our impact assessment, rights assessment, or equality impact</p>	<p>Confidential? –N</p>

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<p>assessment? Please provide any information or evidence in support of your views.</p>	<p>We have serious concerns regarding the Equality Impact Assessment (EqIA), Rights Assessment, and General Impact Assessment provided in Ofcom’s consultation. As currently presented, these assessments fail to meet the legal and procedural standards expected of a public body, particularly under the Public Sector Equality Duty (PSED), the Human Rights Act, and broader principles of proportionality, neutrality, and non-discrimination.</p> <p>1. Lack of Evidence and Methodological Transparency</p> <p>The assessments claim that certain online harms “disproportionately” impact women and girls, but this assertion lacks clear evidentiary support or methodological rigour. No transparent framework is provided to show how “disproportionality” was measured or why harms affecting other groups—particularly men and boys—were excluded.</p> <p>Examples where data contradicts the consultation narrative:</p> <ul style="list-style-type: none"> • Pile-ons: Ofcom’s own Illegal Harms consultation data shows 20% of male respondents reported experiencing pile-ons, versus 15% of female respondents. • Journalist risks: UNESCO data shows approximately 90% of murdered journalists are male, suggesting occupational targeting is not gender exclusive. • Sextortion and intimate image abuse: Global data indicates that the majority of sextortion victims are male, particularly among adolescent and LGBTQ+ populations. • Underreporting of abuse: Male victims of domestic and online abuse report at much lower rates (12%) than females (25%), indicating significant systemic underrepresentation in support frameworks and data collection. <p>These examples reveal that many of the harms cited as uniquely affecting women and girls are either shared across genders or disproportionately affect other</p>

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	<p>demographics, including men and boys. The failure to reflect this undermines the credibility and neutrality of the EqIA.</p> <p>2. Non-Inclusive and Biased Stakeholder Engagement</p> <p>The consultation process appears to have been conducted with a narrow set of stakeholders, many of whom accept the gendered framing of harm without challenge. There is no visible engagement with organisations or researchers focused on male victims, gender-neutral safety models, or those critical of identity-based regulatory approaches.</p> <p>This lack of diversity has created an “echo chamber” that excludes contrary evidence, risks procedural unfairness, and fails to meet the requirement under the Equality Act 2010 to advance equality of opportunity across all protected characteristics, including sex in its entirety.</p> <p>3. Risk of Discriminatory Regulatory Outcomes</p> <p>By proposing gender-specific recommendations without parallel consideration for men and boys, the guidance risks encouraging discriminatory practices at the platform level:</p> <ul style="list-style-type: none"> • Platform discrimination: Providers may be incentivised to design safety systems that serve one demographic over others, risking a breach of their own equality obligations. • Regulatory partiality: Ofcom, in its role as a public authority, could be perceived as advancing a gender-biased regulatory regime, undermining its duty to regulate impartially and lawfully. • Public trust erosion: A failure to recognise or address harms to men and boys risks diminishing public confidence in Ofcom as an impartial, evidence-led regulator. <p>4. Insufficient Consideration of Human Rights and Proportionality</p>

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	<p>The guidance, as interpreted through the current rights assessment, gives inadequate attention to:</p> <ul style="list-style-type: none"> • Article 10 – Freedom of Expression: Broad references to “gender-based harms” in content moderation and user reporting systems may chill lawful speech, especially where definitions remain vague or ideologically loaded. • Article 14 – Freedom from Discrimination: As currently framed, the regulatory strategy may disproportionately benefit one gender group, resulting in discriminatory effects. • Proportionality: Regulatory measures must be proportionate to the risks they seek to address. A focus on one group, to the exclusion of others facing equal or greater harm, does not meet this threshold. <p>5. Recommendations for Revision</p> <p>To ensure the assessments meet both legal requirements and public expectations, we strongly recommend that Ofcom:</p> <ul style="list-style-type: none"> • Commission an updated, balanced EqIA: This should consider the full spectrum of gender-based and gender-neutral harms using transparent methodologies and disaggregated data. • Broaden stakeholder engagement: Include voices from a wider range of affected groups, including organisations representing men and boys, LGBTQ+ users, and others at high risk online. • Reframe language: Replace ideologically charged terms like “gender-based harms (against women and girls)” with evidence-based, inclusive terminology that reflects real-world harm profiles. • Respect freedom of expression and non-discrimination: Ensure that content regulation

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	<p>frameworks do not infringe lawful speech or promote discriminatory platform policies.</p> <p>Conclusion</p> <p>As they stand, the equality and rights assessments fall short of the legal, empirical, and ethical standards expected in public regulation. The selective focus on one demographic risks entrenching inequality, eroding public confidence, and potentially exposing Ofcom to judicial review or legal action for breach of the Equality Act 2010, indirect discrimination, and violations of human rights protections.</p> <p>For Ofcom’s framework to be credible, inclusive, and effective, it must be revised to reflect the full landscape of online harms and the diverse range of users affected by them.</p>
<p>Question 6: Do you agree that our draft Guidance is likely to have positive effects on opportunities to use Welsh and treating Welsh no less favourably than English? If you disagree, please explain why, including how you consider the draft Guidance could be revised to have positive effects or more positive effects, or no adverse effects or fewer adverse effects on opportunities to use Welsh and treating Welsh no less favourably than English.</p>	<p>Confidential? –N</p> <p>No comment.</p>

Please complete this form in full and return to OS-Section54@ofcom.org.uk.