Consultation response form
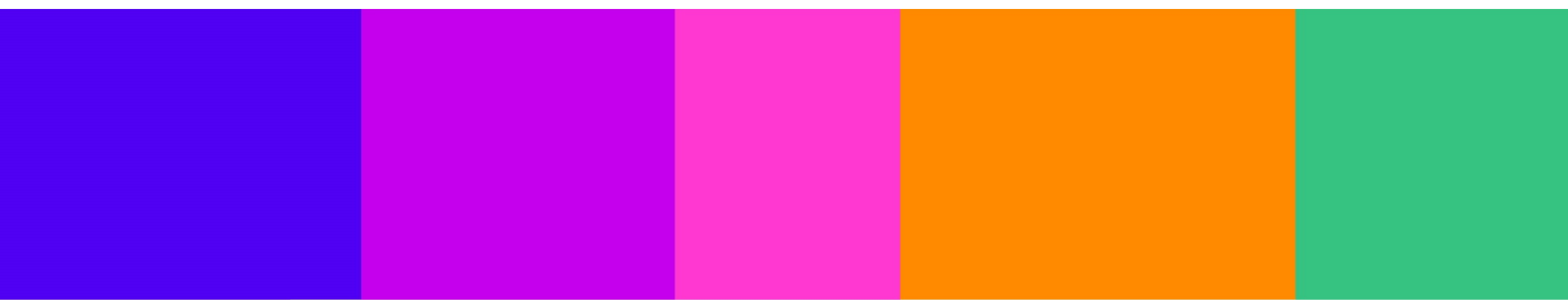
Please complete this form in full and return to protectingchildren@ofcom.org.uk.

Consultation title	Consultation: Protecting children from harms online
Full name	Domestic Abuse Commissioner's Office
Contact phone number	
Representing (delete as appropriate)	Organisation
Organisation name	Domestic Abuse Commissioner's Office
Email address	commissioner@domesticabusecommissioner.independent.gov.uk

Confidentiality

We ask for your contact details along with your response so that we can engage with you on this consultation. For further information about how Ofcom handles your personal information and your corresponding rights, see Ofcom's General Privacy Statement.

Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential? Delete as appropriate.	Organisation name
We will publish responses to this consultation on our website. Please indicate how much of your response you want to keep confidential (i.e. not published by Ofcom). Delete as appropriate.	None
We may want to reference your response in future publications (including our statement). For confidential responses, can Ofcom publish a reference to the contents of your response?	Yes

Your response

Question	Your response
Volume 3: The causes and impacts of online harm to children. **Draft Children's Register of Risk (Section 7)** **Draft Guidance on Content Harmful to Children (Section 8)**	

Confidential? – N

The Domestic Abuse Act (2021) defines domestic abuse as behaviour that is "abusive" and the parties involved must be "personally connected" to each other. Abusive behaviour is: "physical or sexual abuse; violent or threatening behaviour; controlling or coercive behaviour; economic abuse; psychological, emotional or other abuse; and it does not matter whether the behaviour consists of a single incident or a course of conduct"[1]. The Domestic Abuse Act 2021 recognised children as victims of domestic abuse in their own right for the first time. Section 3 of the Act defines "Children as victims of domestic abuse" as an individual under 18 years who "sees or hears or experiences the effects of the abuse".

An estimated 2.1 million adults experienced domestic abuse in the last year (ONS, 2023). One in five children live with domestic abuse (Radford et al, 2011).

Pornographic Content

Advancements in technology have made pornography more accessible to young people, and an increasing body of evidence has linked viewing extreme or violent pornography with violent or abusive behaviour in young men[2]. The Angiolini Inquiry - established to investigate how an off-duty police officer was able to abduct, rape and murder a member of the public – found that Wayne Couzens (the police officer who committed these crimes) had a "preference for violent and extreme pornography and [a] history of alleged sexual offending"[3].

[1] Domestic Abuse Act 2021. UK Government. 2021. Retrieved 13 June 2021.
[2] Pornography, Sexual Coercion and Abuse and Sexting in Young People's Intimate Relationships: A European Study - Nicky Stanley, Christine Barter, Marsha Wood, Nadia Aghtaie, Cath Larkins, Alba Lanau, Carolina Överlien, 2018 (sagepub.com)
[33] Angiolini Inquiry Part 1 Report - GOV.UK (www.gov.uk)

Question	Your response

Access to porn or sexually explicit content puts children at greater risk of developing unrealistic attitudes about sex and consent, and more negative or harmful attitudes about gender roles and identities in relationships[4]. These unrealistic or harmful attitudes can result in behaviours akin to domestic abuse (see definition above). While there are still data/evidence gaps in terms of numbers of children accessing pornographic material online regularly, a meta-analysis of 125 representative studies over a 12-year period found that 'nearly 13% of the world's children have been victims of non-consensual taking, sharing and exposure to sexual images and videos'[5]. A report on young people and pornography based on a government-commissioned review by the Children's Commissioner for England and Wales found that "79% [of teenagers surveyed who had been exposed to online pornography] had encountered violent pornography before the age of 18"[6].

The 'impacts' section of the pornographic content chapter explains some of the societal harms that access to harmful pornography can exacerbate. However, there is little mention of the interplay with domestic abuse. There are clear links set out between exposure to violent or extreme pornography and 'harmful attitudes to sex and relationships' as well as skewed views of consent, romantic relationships, and unrealistic expectations of sex. The Register of Risks fails, however, to be explicit here in terms of links to domestic abuse.

Regular watching of extreme or violent pornography plays a significant role in physical and sexual violence for both physical abuse and sexual offences[7]. [8]Viewing pornography in order to imitate what is happening in the pornography have played a key role in both the "sexual victimisation of women as well as to the physical abuse of women"[9][10][11]. To contextualise this prevalence of sexual violence and physical abuse in the context of domestic violence, it is important to

[4] Online porn | NSPCC

[5] into-the-light.pdf (childlight.org) Childlight – Global Child Safety Institute. Into the Light Index on Child Sexual Exploitation and Abuse Globally: 2024 Report. Edinburgh: Childlight, 2024.

[6] cc-a-lot-of-it-is-actually-just-abuse-young-people-and-pornography-updated.pdf (childrenscommissioner.gov.uk)

[7] Johnson, S. A. (2007). *Physical abusers and sexual offenders: Forensic and clinical strategies.* Boca Rotan, FL: CRC/Taylor & Francis.

[9] Recognizing Connections Between Intimate Partner Sexual Violence and Pornography - Laura Tarzia, Meagan Tyler, 2021 (sagepub.com)

[10] Exploring the Connection Between Pornography and Sexual Violence - ProQuest

[11] Aggressive Behavior | Behavioral Science Journal | Wiley Online Library

Question	Your response

note that 1 in 2 rapes against women are carried out by their partner or ex-partner[12]. In terms of early exposure in particular, a longitudinal study found that "early exposure for males predicted less progressive gender role attitudes, more permissive sexual norms, sexual harassment perpetration"[13].

Without emphasising the coexistance of domestic abuse and exposure to violent and extreme pornography, the consultation misses a vital opportunity to bolster the need for change and increase understanding of domestic abuse, especially in regard to children and young people. Nine in ten girls and young women in schools surveyed by Rape Crisis UK reported that sexist name-calling and being sent unwanted 'dick pics' or other images of a sexual nature happens to them or other girls and young women their age[14].

Similarly, Section (7.1.40) states that "this belief that pornography is realistic, especially when combined with the presence of pornographic content containing themes of violence (see 'Presence' sub-section), presents the risk that children watching pornographic content develop harmful attitudes towards gendered norms and behaviours during sex.... These attitudes present a risk of physical and psychological harm to girls in particular, by informing offline violence against women and girls, and attitudes towards consent (see 'Impacts' sub-section)" – however, neither this nor the 'impacts' sub-section hold any mention of the impacts of pornography on abusive behaviour or how these harmful attitudes towards women and physical harm may contribute to incidents of domestic abuse.

There is much evidence that shows links between children's access to online pornography and negative gender attitudes[15][16] which can lead to the reproduction of control and humiliation in relationships[17][18]. Reports of sexual harassment and abuse in schools continue to increase, with a Women and Equalities Select

---

[12] Rape, sexual assault and child sexual abuse statistics | Rape Crisis England & Wales

[13] X-Rated: Sexual Attitudes and Behaviors Associated With U.S. Early Adolescents' Exposure to Sexually Explicit Media - Jane D. Brown, Kelly L. L'Engle, 2009 (sagepub.com)

[14] Rape, sexual assault and child sexual abuse statistics | Rape Crisis England & Wales

[15] Influencers and Attitudes: How will the next generation understand domestic abuse? (womensaid.org.uk)

[16] Mancini, C., Reckdenwald, A., & Beauregard E. (2012). Pornographic exposure over the life course and the severity of sexual offenses: Imitation and cathartic effects. Journal of Criminal Justice, 40(2012), 21–30. doi: 10.1016/j.jcrimjus.2011.11.004

[17] Risk Indicators Associated With Tooth Loss among Indian Adults (researchgate.net)

[18] Aggression and Sexual Behavior in Best-Selling Pornography Videos: A Content Analysis Update - Ana J. Bridges, Robert Wosnitzer, Erica Scharrer, Chyng Sun, Rachael Liberman, 2010 (sagepub.com)

Question	Your response

Committee report[19] citing that one child in school is raped on every school day, and in primary schools alone three sexual assaults are reported to the police every school day. SafeLives 'Verging on Harm' report[20] found that 30% of young people surveyed said they had used harmful behaviours in a relationship, and 41% of these said they had used harmful behaviours in a romantic relationship.

Section 7.1.12 states "Another study found that 7% of 14-17-year-olds who had been in a relationship, reported being pressured to watch pornography by a partner."[21] Prevention education research highlights challenges for service providers including the fact that "young people can misunderstand issues related to domestic abuse, especially the role of power and control within relationships; there is a tension between educators giving young people free expression to share their opinions and challenging sexism and other prejudices; and boys can become disengaged with gender-based interventions."[22] Issues around prevention and education must be targeted through multiple interventions; clearly defining what domestic abuse looks like and the factors that contribute to its prevalence is imperative.

Suicide and Self-Harm Content

In section 7.2.67, Ofcom mentions that children who have had certain adverse experiences may also be at greater risk from suicide/self-harm content. Adverse childhood experiences (ACEs) describe traumatic experiences that can have lasting effects into childhood, the more ACEs an individual experiences, the more challenging they may be to overcome[23]. The 10 original ACEs are: physical, sexual, or psychological abuse, physical or psychological neglect, witnessing domestic abuse, parental separation, or divorce on account of relationship breakdown, or having a close family member who misused alcohol or drugs, had a problem with mental health, or served time in prison[24]. Ofcom has an opportunity here to be clear on the impact of witnessing domestic abuse, as well as the intersectionality between different ACEs and how many are co-occurring or comorbid in nature. The consultation mentions "those with previous trauma (bullying of difficult personal relationships) may be at greater risk of

---

[19] Sexual harassment and sexual violence in schools (parliament.uk)
[20] Verge_of_Harming_Report.pdf (safelives.org.uk)
[21] Protecting children from harms online - Volume 3: The causes and impacts of online harms to children (ofcom.org.uk)
[22] Full article: Domestic abuse prevention education: listening to the views of young people (tandfonline.com)
[23] ACEsInfographic_080218.pdf (harvardcenter.wpenginepowered.com)
[24] adverse-childhood-experiences-summary.pdf

Question	Your response

encountering or engaging with suicide and self-harm content and/or behaviours." There should be a specific mention here of the correlation between exposure to domestic abuse and increased suicide risks[25][26][27][28]. An article in the British Medical Journal from 2022 highlights that domestic abuse is a significant risk factor for suicide[29], and McManus et al (2022) highlighted strong associations between intimate partner violence and self-harm and suicidality[30]. Survivors of domestic abuse are more likely to attempt suicide if they display certain coping mechanisms including use of drugs and alcohol or self-harm. In research conducted by Christie et al (2023), a high proportion of survivors of domestic abuse who attempted suicide did so after instances of self-harm as a way of coping. They also coped through eating in a disordered way. The links between victims and survivors of domestic abuse, self-harm and suicide are clear, and it is important that there is specific mention of domestic abuse as a risk factor here. "Domestic abuse dismantles the survivor's identity"[31] and the clear links between women experiencing domestic abuse and suicide/self-harm should be highlighted to encourage platforms to translate this information into operational understanding and practice.

A research report into Domestic Homicide Reviews in England and Wales conducted by the HALT (homicide abuse learning together) team at Manchester Metropolitan University and commissioned by the Domestic Abuse Commissioner referenced impact of childhood trauma on domestic homicides of victims 25 years and under. Common to these cases were experiences of childhood trauma and care. Unique relational dynamics and risks were also apparent, including the unequal dynamics of first-time intimate relationships, abuse which leveraged or involved online spaces, and teenage pregnancy[32]. The clear

[25] The relationship between domestic violence against women and suicide risk - ScienceDirect
[26] Domestic abuse and suicide : exploring the links with refuge's client base and work force - WRAP: Warwick Research Archive Portal
[27] Christie, C., Rockey, J. C., Bradbury-Jones, C., Bandyopadhyay, S., & Flowe, H. D. (2023, April 5). Domestic Abuse links to Suicide: Rapid Review, Fieldwork, and Quantitative Analysis Report. https://doi.org/10.31219/osf.io/4t9ab
[28] Domestic Violence as a Risk Factor for Attempted Suicide in Married Women - Pankajakshan Vijayanthi Indu, Sivaraman Remadevi, Karunakaran Vidhukumar, Peer Mohammed Shah Navas, Thekkethayyil Viswanathan Anilkumar, Nanoo Subha, 2020 (sagepub.com)
[29] https://doi.org/10.1136/bmj.o2890
[30] Intimate partner violence, suicidality, and self-harm: a probability sample survey of the general population in England - The Lancet Psychiatry
[31] Christie, C., Rockey, J. C., Bradbury-Jones, C., Bandyopadhyay, S., & Flowe, H. D. (2023, April 5). Domestic Abuse links to Suicide: Rapid Review, Fieldwork, and Quantitative Analysis Report. https://doi.org/10.31219/osf.io/4t9ab
[32] Summary-of-Findings-Childrens-Services-Domestic-Homicide-Oversight-Mechanism-2023.pdf (domesticabusecommissioner.uk)

Question	Your response

links between online abuse and domestic homicide in young people highlight the need for a clearer picture to be painted by Ofcom during this chapter, connecting domestic abuse, ACEs and suicide/self-harm.

Although these studies pertain to adults, it is reasonable to assume that domestic abuse would be a significant risk factor when thinking about which users - of all ages - are more at risk when accessing suicide/self-harm content. It is important to include exposure to/experiences of domestic abuse in the socio-economic factors/user circumstances section in this chapter, to make platforms aware of the clear connection between domestic abuse and suicide/self-harm, and to encourage platforms to keep these connections in mind when considering safety-by-design.

Similarly, when describing user base risk factors of suicide and self-harm content, Ofcom highlight that 'although not directly linked to demographics, children who have had certain previous life experience of trauma, such as bullying, are also at increased risk from encountering this content'. Whilst the recognition of this is encouraging to see, the inclusion of references to ACEs and further clear examples of 'certain previous life experience of trauma' - including children as victims of domestic abuse and the intersectionality of ACEs – would be beneficial to include.

Abuse and Hate Content

Ofcom's definition of abuse and hate content define content specifically targeted at listed characteristics including age, gender, gender identity and sexual orientation, mental health and disability, and socio-economic factors. Ofcom define abusive content as "content that insults, derogates, dehumanises or threatens a person on the basis of a listed characteristic" and content inciting hatred as "content that encourages, advocates, or justifies animosity, hostility, rejection or violence against a group of persons on the basis of a listed characteristic" (p.325). It is important that this definition be restructured or extended, as currently this definition reads as abuse in relation to hate crimes rather than comments that include hateful comments towards known victims (e.g., domestic abuse). Definition 7.4.6 (p106) highlights specific groups-on-group or individual-on-group abuse, based on characteristics. Abuse and abusive content

Question	Your response

can be directed at anyone and can be based on an individual's pre-existing relationship with the abuser. In the case of domestic abuse and abusive content in this context – although domestic abuse is a gendered crime - the abuser does not necessarily target the victim based on listed characteristics, and therefore this should be considered. If this definition is not restructured there will be legal but harmful types of hateful and/or abusive content that will not be captured in this or the Illegal Harms consultation.

Digital media - in all its forms - intensifies existing patterns of gendered violence and creates new forms of abuse[33]. Violence against women and girls is the cause and consequence of gender inequality, and as such, misogyny often lies at its root. This highlights the significant role of digital media and online platforms in mediating, coordinating, and regulating such behaviour. Academics are starting to document how platforms can foster counter-misogynistic discourse and act as powerful agents for positive change through the regulation and governance of online abuse[34].

The widespread use of social media enables instant information sharing, facilitating dialogue in a manner that print media or scholarly journals cannot match. The anonymity of the internet lowers inhibitions and diminishes accountability, resulting in uncharacteristic conduct online, otherwise known as 'deindividuation'[35]. This is where online interactions can descend into vulgar and hateful assaults, potentially inciting outrage. As Crocket (2017) posits, "digital media may exacerbate the expression of moral outrage by inflating its triggering stimuli, reducing some of its costs and amplifying many of its personal benefits"[36]. Buckels, Trapnell, and Paulhus (2014) suggest this type of trolling – usually centred around race-baiting, misogyny, and threats - is partly a way to advance status due to the action seemingly providing a sense of power to provoke response[37].

[33] Technology facilitated coercive control: domestic violence and the competing roles of digital media platforms: Feminist Media Studies: Vol 18, No 4 (tandfonline.com)
[34] Technology facilitated coercive control: domestic violence and the competing roles of digital media platforms: Feminist Media Studies: Vol 18, No 4 (tandfonline.com)
[35] Hertlein, K. M. (2012). Digital dwelling: Technology in couple and family relationships. Family Relations, 61, 374-387.
[36] Crocket, M. J. (2017). Moral outrage in the digital age. Nature Human Behavior, 1, 769-771. Retrieved from https://www.nature.com/articles/s41562-017-0213-3. doi:10.1038/s41562-017-0213-3
[37] Buckels, E. E., Trapnell, P. D., & Paulhus, D. L. (2014). Trolls just want to have fun. Personality and Individual Differences, 67, 97-102.

Question	Your response

Further to this, the consumption of violent misogynistic content is a common issue linking individuals who consume Islamist/DAISH extremist content and those who consume extreme right-wing content. Terrorism is another form of predominantly male violence, and the current use of online radicalisation and lone actors has seen increasingly young perpetrators and consumers being arrested (1 in 5 arrested are children, and nearly all are boys)[38]. Whilst clear links have been made between the consumption of abusive misogynistic content by incels and lone actors, regulation does not go far enough in prevention of children and young people being exposed to this material. Specialist sector experts from Rape Crisis UK have noted their concern with the over policing of minoritized, racialised communities in the context of counterterrorism, meanwhile online VAWG crimes are still significantly under-policed. Violent and hateful misogynist speech is allowed online (note Ofcom's reference to Andrew Tate in section 7.6.25) whilst hard line legislation and regulation has made online counterterrorism policing more effective and successful in recent years. To target and prevent these types of illegal harms, it is imperative to look at what inappropriate/harmful content individuals are consuming and take steps to stop this content from being easily accessed by children and young people online in the future.

The above examples of hateful and abusive comments online provide a more nuanced framework under which platforms should be regulating. Platforms should be alert to the nature of how hate and abuse manifests online, especially regarding VAWG and victims who are subject to domestic abuse. This will encourage evidence-based, user-informed safety-by-design and more effective content moderation. Describing abuse and hate content purely in the context of the recipient or victim being targeted because of protected characteristics fails to consider how hate can manifest and be facilitated online and doesn't capture all forms of abuse and hate content (including victims of abusive comments by known perpetrators not based solely on a personal characteristic). Negative discourse online can lead to real-life violence. For instance, cyberstalking co-occurs regularly with real-life harm and intimidation of victims[39]. Jake Davison – a self-described incel -murdered five people in a shooting spree in 2011, after frequently posting abusive and misogynistic content

---

[38] Statistics provided by the Assistant Commissioner for Specialist Operations within the Metropolitan Police Service

[39] Cyberstalking: Definition, Signs, Examples, and Prevention (verywellmind.com)

Question	Your response

online. It is important to capture this wider pool of types of online abuse and hatred to protect victims of domestic abuse alongside victims of other abuse and hate content.

As social networks and online platforms continue to grow in influence, it is important that these types of hateful and abusive comments are captured within this guidance. Online negativity and victim blaming are broad societal issues with personal consequences, and the negative effects on readers – in particular children – include anger, self-blame, and even self-harm[40]. Social networks not only influence public movements but also transform how violence and victimisation are discussed. Social media coverage of stories including themes of sexual harassment and abuse come become widespread and well-debated topics e.g., #metoo. Evidence shows that these new conversations perpetuated by social media can become as - or in many cases - more powerful than the original media coverage[41]. The nature of this online discourse will have different mental and emotional effects on victims. In the case of a victim of domestic abuse, the survivor who has shared their story will "likely experience online support and community very differently from online blaming and shame. In such cases, digital interactions have potential to be helpful or harmful in influencing individual lives."[42] This highlights the integral role that platforms play in terms of regulation and reporting mechanisms, and how the systemic societal changes needed to improve the lives of women and girls subject to violence and/or domestic abuse can be directly supported by strong understanding and governance of social media. Koban et al. (2018) suggested appropriate governance can reduce the spread of online anger: "The link between toxic behaviour and more toxic behaviour might also underline the incessant necessity of moderation and administration efforts for professional providers of social networking services"[43].

Section 7.4.15 encouragingly references the misogynistic content being encountered by children and ties to the 'manosphere'. Considering the alarming statis-

[40] Rainie, L., Anderson, J., & Albright, J. (2017, March). The future of free speech, trolls, anonymity and fake news online. Pew Research Center. Retrieved from http://www.pewinternet.org/2017/03/29/the-future-of-free-speech-trolls-anonymityand-fake-news-online/

[41] Altheide, D. L., & Schneider, C. J. (2013). Qualitative media analysis. Thousand Oaks, CA: Sage

[42] Online Blaming and Intimate Partner Violence: A Content Analysis of Social Media Comments (byu.edu)

[43] Koban, K., Stein, J., Eckhardt, V., & Ohler, P. (2018). Quid pro quo in Web 2.0. Connecting personality traits and Facebook usage intensity to uncivil commenting intentions in public online discussions. Computers in Human Behavior, 79, 9-18. doi:10.1016/j.chb.2017.10.015

Question	Your response

tics regarding the percentage of children exposed to abusive and hateful content, along with the evidence of its widespread impact – linking to counterterrorism - it is crucial to highlight and explore misogyny as a separate, standalone chapter in the Register of Risk. This will underscore its significant role as a cause of online harm to children (this recommendation is explored further under the 'other/wider issues' section below).

Encouragingly, Section 7.4.44 notes how online harms interplay with each other, reflecting previous advice from the Domestic Abuse Commissioner [44].

Table 8.6.2 gives examples of abusive and harmful content that could be accessed by children. Given the above, it would be useful to make clear that these are examples that aren't necessarily based on individual characteristics. For example, "A derogatory meme or caricature of a person, with threatening, abusive, hurtful or harmful commentary added" could be directed towards a victim of domestic abuse by a family member or intimate partner without the hate being based on or directed at a particular characteristic.

Lack of intersectionality and reference to so-called honour-based abuse

When referring to the different types of content in both this and the previous 'Illegal Harms' consultation, there seems to be a gap in terms of where certain types of images that may illicit harmful responses or backlash may lie. This situation ties into what seems to be a lack of acknowledgement that online users from different cultural backgrounds will experience these harms differently from others. Rigid boundaries of definition and categorisation in these consultations has created a representation gap, and the lack of acknowledgement of experiences of certain users will create a support gap for these users when platforms are using this guidance to design their reporting and moderation mechanisms. One example of this is what may be deemed an 'intimate' or 'indecent' image.

Intimate image abuse is covered in the Illegal Harms consultation. The term 'intimate image abuse' occurs when intimate images are shared or distributed without consent of the person pictured and is a criminal offence. When thinking about what constitutes an 'intimate image', Ofcom note that "interpretations of what is 'intimate' can vary among different cultural and religious groups, but for

[44] 140224-Ministerial-letter-illegal-harms.pdf (domesticabusecommissioner.uk)

Question	Your response

present purposes we refer to the new offence in section 66(B) of the Sexual Offences Act 2003". Here, Ofcom draw the boundary of what would be classed intimate image abuse, and therefore illegal harm.

In the Register of Risks for this consultation, Ofcom are define pornographic material and give examples ("Examples of pornographic content include explicit photographs; images or videos of real sexual activity; content depicting full frontal nudity or genitals, breasts or buttocks; or fetish material – for which it is reasonable to assume that the content was produced 'solely or principally' for the purpose of sexual arousal").

Whilst these are both reasonable boundaries to draw, it is important to highlight that a subsection of people (e.g., members of marginalised faith communities, ethnic communities, conservative cultures and orthodox cultures) will have differing ideas of what makes an image 'indecent', immodest or immoral. Ofcom has not included acknowledgements or examples of to how images of children or young people holding hands, kissing, or women and girls from certain cultural backgrounds being seen without hair coverings could be seen by some communities or cultures as 'intimate', 'sexual' and/or 'immoral' and could have serious negative impacts or consequences on the person/people in the picture and/or family members. Images such as those described above have far-reaching implications in different cultural settings and can lead to the perpetration of abuse including so-called honour-based abuse against the victim. This type of content, whilst technically not covered by legislation covering intimate image abuse, , must be acknowledged within Ofcom's guidance to platforms, to increase understanding and awareness . So-called Honour Based Abuse (HBA) is frequently misunderstood, misidentified and placed into a 'cultural cul-de-sac', whereby victims affected are conditioned to normalise abuse in the name of 'culture' and professionals responding tread carefully with excessive 'cultural sensitivity'"[45]. In order to avoid this gap in understanding, identification and support, there needs to be clear guidance for platforms on setting up support for content take-down, alongside protective measures put in place for those subject to so-called honour-based abuse. Including examples such as this in Ofcom's guidance will increase professional confidence and prevent unsafe responses from platforms, including professionals and regulators/moderation systems that normalise oppressive 'cultural expectations' and 'othering'.

---

[45] committees.parliament.uk/writtenevidence/35610/pdf/

Question	Your response

In the 'Your Choice' report conducted by SafeLives, victims of HBA were "at greater risk of serious harm or homicide"[46]. When referring to the risk factors for self-harm and suicide in chapter 7.2 of the Register of Risk, there is no specific mention of this in the user base risk factors section. This is another example where a clear acknowledgement of intersectionality would increase understanding and opportunity for change.

In written evidence submitted to the Violence Against Women and Girls Call for Evidence, Karma Nirvana note that in order to tackle so-called honour-based abuse, "it is imperative that strategies tackling VAWG commit to taking action to dismantle and eradicate misogynistic attitudes, customs and practices that lower the value of women and girls" – "Central to prevention is raising the status of women and girls that are silenced by concepts of honour and shame, enabling them to recognise the abuse that they experience is a form of 'domestic abuse' and that safe spaces exist for them too."[47] This is another example where directly acknowledging and tackling misogynistic content online is imperative in preventing other linked harms. The Karma Nirvana report also highlights that previous strategies set out by Government to tackle VAWG have failed "tackle the root cause to theses issue (beliefs, values and attitudes which devalue women and girls), dealing only with the consequences (FM, FGM, coercive control etc)." It seems that by not cohesively addressing misogyny-based content but naming consequences of the harmful beliefs and attitudes that are portrayed within this content, this consultation may be following a similar trajectory.

It is also important to highlight the lack of acknowledgement of gendered forms of islamophobia and antisemitism throughout this and the previous illegal harms consultation, particularly in regard to the abuse and hate content in the current Register of Risk. Young women and girls from these communities are overwhelmingly targeted online, and the double bind that these women face in terms of online policing and being targeted by markers of their identity must be explained, addressed and evidenced in this consultation. A report by Tell MAMA this year found that "between October 7 2023 and February 7 2024 alone, Tell MAMA recorded 2,010 Islamophobic incidents, predominantly targeting Muslim

---

[46] Your-choice-Spotlight-on-HBV-and-forced-marriage.pdf (safelives.org.uk)
[47] committees.parliament.uk/writtenevidence/35610/pdf/

Question	Your response

women and on social media platforms, a stark increase from 600 incidents during the same period the previous year."[48] "Disinformation, misinformation and platform manipulation" are key issues that must be addressed through educational means, including schemes to "improve social media and digital literacy, as platforms prove more reactive in removing and flagging materials as inflammatory and misleading", and this work can be supported further by making clear to platforms what must be removed and/or flagged as inflammatory and misleading.

The director of Tell MAMA, Iman Atta OBE, commented in Tell MAMA's 'Manifesto Against Hate Crimes (2024) "social media companies act pretty much with impunity. The impacts of their platforms on the victims of online hate crimes are so significant that we have had clients complaining that they have contemplated suicide". This report further evidences the adverse experiences of victims and survivors from ethnic and minoritized communities online, and the links between social media platforms being used to "malign Muslim communities, dehumanise them and to target individuals for online and real-world 'mobbing'". Muslim women remain the primary victims of anti-Muslim hatred and islamophobia, and there is an opportunity within these consultations to adopt a clearer intersectional framework, which could foreground the experiences of women and girls from Muslim communities to remove bias and promote compassion.

Ofcom must go further to acknowledge and represent those from minoritized communities and differing cultural and religious backgrounds. The Domestic Abuse Commissioner therefore recommends that there are distinct references to so-called honour-based abuse and intersectional differences (especially in terms of violent content and abuse and hate content). Platforms must be given further evidence and guidance that will increase understanding and provide support for victims. Links must be highlighted between these types of abuse and priority content covered in this consultation.

Violent Content

---

[48] Tell MAMA's UK General Election Manifesto Against Hate Crimes 2024 (tellmamauk.org)

Question	Your response

"By any definition, violence towards an intimate partner is a manifestation of aggressive behaviour."[49] Aggression is defined as "violence", specifically a behaviour that "intends to injure" - physically and psychologically – another person "using corporal or verbal means".[50] There are differing theories of aggression, with some stating that aggression is an instinct, whilst others posit aggression as learned behaviour… Whilst the theory that human aggression is inscribed in our genes has received limited support[51], there is much empirical evidence supporting the view that aggression is a "learned behaviour rather than an innate temperament"[52]. Bandura theorises that aggression is learned through observation[53]. Mass media have been known to instigate violence in real life, including so-called "copycat suicide"[54]. A preference for watching violent programs in childhood is disproportionately associated with aggressive behaviour during adolescence. Watching aggressive role models - live or on screen -significantly increases the amount of aggressive behaviour displayed by children compared to those who view non-aggressive role models or have no access to violent scenes. Observing live role models leads to the imitation of more specific aggressive acts, whereas observing filmed role models, whether real or cartoon, triggers a broader range of aggressive responses.[55][56][57] Indeed, research into the effects of media violence on younger watchers have proven links between heavy exposure in films, videos, televisions and movies and increased risk of violent behaviour.[58]

The Register of Risks highlights that exposure to violent content, particularly "the physical and psychological harms that can arise from this kind of content… can include the normalisation and adoption of violent behaviours, alongside anxiety, avoidant behaviours and other emotional distress". However, there is currently no mention of how this exposure could affect romantic or familial relationships,

[49] Domestic violence - PMC (nih.gov)
[50] Risky, aggressive, or emotional driving: Addressing the need for consistent communication in research - ScienceDirect
[51] The neurobiology of aggression and rage: Role of cytokines - ScienceDirect
[52] Domestic violence - PMC (nih.gov)
[53] PsycNET Record Display (apa.org)
[54] Media coverage as a risk factor in suicide | Journal of Epidemiology & Community Health (bmj.com)
[55] Viewing Preferences, Symptoms of Psychological Trauma, and Violent Behaviors Among Children Who Watch Television - ScienceDirect
[56] The Role of Media Violence in Violent Behavior | Annual Reviews
[57] Domestic violence - PMC (nih.gov)
[58] The-Effect-Of-Domestic-Violence-Films-On-The-Youth-An-Excursion-Of-Media-Violence-Theories-and-Persuasion-Theories.pdf (researchgate.net)

Question	Your response

and how increased risk and normalisation of violent behaviour in society could result in higher prevalence of domestic abuse. It would be encouraging to see Ofcom acknowledge the links here and to provide explicit examples online where violent content normalises domestic abuse and/or violence against women and girls (VAWG). Whilst section 7.6.25 mentions the links between exposure to content promoting VAWG and 'a difference in attitudes towards violence among children', the section does not delve specifically into what those attitude shifts mean for women and does not touch on the wider societal impacts in relation to violence against women and girls and domestic abuse[596061]. Radical populists such as Andrew Tate mentioned in this section and alt-right demagogues have embraced social media as a platform to spread misogynistic and racist hate speech and emotionally mobilise their supporters. This digitally mediated violence, though relatively new, is a crucial component of the continuum of violence connecting interpersonal violence, violent societal structures, and ideological and political violence, and must be treated with the same urgency and importance when discussing children's exposure to violent content and negative societal outcomes. Palgrave's studies into victims and victimology emphasise "discursive expressions of hatred are spread through social media and shape our understanding of reality. They are not only violent themselves but also pave the way for an ideological readiness to use other types of violence."[62] Below are a series of examples of where there are opportunities in this chapter for such content to be included to explain and present the risks of this content clearly to platforms.

Section 7.6.71 discusses violent comments during direct messaging whilst gaming. The Register of Risk comments on instances where children experience violence in gaming due to "violent comments sent by other users during play". This section provides an opportunity to highlight the gendered nature of these violent comments. Over half of women gamers experience online abuse and violence, with those 16-24 the highest targeted[63]. 14% of young women and girls has experienced direct threats of rape, whilst 42% received gendered verbal abuse. 34% of women and girls who are gamers state that they choose not to

[59] ONLINE MISOGYNY on JSTOR
[60] Domestic Abuse and Sexual Assault in Popular Culture - Laura L. Finley - Google Books
[61] Influencers and Attitudes: How will the next generation understand domestic abuse? (womensaid.org.uk)
[62] Gendered Violence Online: Hate Speech as an Intersection of Misogyny and Racism | SpringerLink
[63] POISE Web Gateway - Notification (womeningames.org)

Question	Your response

speak during online games due to "fear of negative reactions from male gamers", and whilst this could intersect with the 'Abuse and Hate Content' section of the Register of Risk (or could sit in a separate section specifically on misogyny and online VAWG) it is important to highlight here as there is clearly so much more to be done by platforms to support women and girls in the online gaming space.

Table 8.8.2 provides a description and examples of what Ofcom considers to be content that encourages, promotes or provides instructions for an act of serious violence against a person. Within this table the content description reading 'serious violent threats made against individuals or groups where threats are not based on race, religion or sexual orientation' does not mention gender. Whilst violent threats based solely on gender are not currently considered a hate crime (which is the assumed reason for not including gender here), this is an excellent example of an opportunity where Ofcom can go further and be explicit in including gender-based and domestic abuse-related examples in content descriptions to underline the seriousness of the ramifications for children when exposed to this violent online content. Evidence suggests that platforms need explicit and clear boundaries in order to take action and change services for the better[64]. Ofcom have an opportunity in the Register of Risk to name examples of violent content related to domestic abuse in this table and elsewhere to give platforms these clear boundaries.

A further example in table 8.8.2 gives a description of 'content which glorifies, promotes of glamourises violence' being 'a post which justifies or defends the use of sexual violence'. This example could be extended to domestic abuse. Ofcom mention an example of a video where domestic abuse is commended as a means to 'control' women, the inclusion of which is welcome. Domestic abuse has a much wider context and impact than this however, and it would be useful to include in the scope of justification in the previous example, and to alter the phrasing of the point on domestic abuse. It would be useful to include an example with no physical violence but a strong example of non-physical coercive and controlling behaviour (CCB) in the context of domestic abuse to clearly demonstrate the wider breadth of what CCB can look like to platforms.

An example of 'content which trivialises or misrepresents violent acts, where the purpose is to normalise or discount the impact of violent behaviour' is also

---

[64] Theresa May attacks 'vile' online threats against women - BBC News

Question	Your response

given here. The example given is 'a post which argues that victims and survivors of sexual assault must bear some responsibility'. It is important to include domestic abuse here too, to make clear that domestic abuse is not secondary in seriousness or nature to sexual violence or abuse e.g., 'why doesn't she just leave?'.

There are further opportunities for the inclusion of examples of domestic abuse/VAWG in gaming content described in this chapter. The content description of 'gaming content depicting serious violence or injury against a realistic human character' currently includes references to CGI human characters being beheaded or exploded. There is a myriad of popular games (for instance, Grand Theft Auto) where characters are able to commit extremely violent acts on female characters. Ofcom's definitions of serious violence include "real life fights where individuals are being stamped on/punched/kicked repeatedly", and in games where male to female violence sees these acts played out on realistic human characters, it should be important to highlight the risks of attitudinal shifts and normalisation of male to female violence where young people are exposed to such games.

Other/Wider Issues

Prevalence of Online Misogyny

51% of 13–17-year-olds expressed that they are 'highly concerned' about misogynistic content[65] and the real-world implications of being exposed to content of this nature in childhood is well-documented and evidenced[66][67]. Sexual abuse and harassment online is often 'normalised' in schools[68]; 9 in 10 girls in an Ofsted report having received unsolicited images and/or had been subject to sexist name calling[69]. As online misogyny is a newly emerging form of VAWG, there are limited numbers of interventions and conceptual discussions to combat the exponentially growing issue. Online misogyny poses "distinct challenges because it has no national boundaries and because it challenges traditional

[65] Experiences of using online services - Ofcom
[66] Online misogyny and feminist digilantism: Continuum: Vol 30, No 3 (tandfonline.com)
[67] ONLINE MISOGYNY on JSTOR
[68] Everyone's Invited (everyonesinvited.uk)
[69] Review of sexual abuse in schools and colleges - GOV.UK (www.gov.uk)

Question	Your response

notions of public and private space"[70]. Lewis, Rowe and Wiper (2018) in the Journal of Gender-Based Violence posit that "online misogynistic abuse is a form of hate crime. Using existing literature, three dimensions of hate crime are identified: the nature of motivation, exclusionary intent, and spatial context. There are difficulties in respect of each, and anomalies are identified. However, these are of no greater magnitude than those which apply more widely to other forms of hate crime"[71]. Research by Straw and Tanczer (2023) into safeguarding guidelines for child health practitioners found clear and distinct links between Tik Tok challenges leading to 'an exacerbation of gender-based abuse' and highlighted 'Specific demographic groups… to be more at risk [of tech-facilitated abuse], including young women and girls, LGBTQ youth, religious and ethnic minorities and children'[72]. Whilst the Register of Risk does go some way in addressing the prevalence of misogyny online, it mentions its harmful impact exclusively and specifically in relation to abuse and hate content. By not delving further into the true societal impact of this epidemic and making clear links between other ways misogyny is harmful to young people online (as mentioned above, links between terrorism and exposure to extreme misogynistic content, links between pornography and misogynistic attitudes and behaviours, links between misogynistic content and violent content) the consultation fails to 1) highlight the true scale of the problem that must be addressed and 2) make clear that misogyny is just as harmful and important to address as any named primary priority content. From previous conversations with Ofcom, it is clear that the upcoming guidance specifically centred around VAWG is where these types of harms are due to be covered. Whilst the Domestic Abuse Commissioner supports Ofcom in the choice to prepare VAWG-specific guidance, and sees the positive steps taken in terms of the importance placed on online VAWG, the effect on the Protection of Children consultation seems to be that there is a gap in evidence, understanding and opportunity for change when it comes to the effects of continued exposure to harmful misogyny online accessed by children.

---

[70] Misogyny online: extending the boundaries of hate crime in: Journal of Gender-Based Violence Volume 2 Issue 3 (2018) (bristoluniversitypressdigital.com)
[71] Misogyny online: extending the boundaries of hate crime in: Journal of Gender-Based Violence Volume 2 Issue 3 (2018) (bristoluniversitypressdigital.com)
[72] Straw, Isabel, Leonie Tanczer. Safeguarding patients from technology-facilitated abuse in clinical settings: a narrative review. *PLOS Digital Health* Jan 2023;**2**(no. 1).

Question	Your response
The Domestic Abuse Commissioner would therefore recommend that there is a further chapter added to the Register of Risk which explicitly covers online misogyny, tying ideas from chapters 7.1, 7.4 and 7.6 together and painting a clearer, well-rounded picture of how these harms are experienced by children and young people every day. The clear links between misogynistic attitudes as building blocks for other primary priority harms covered and prevalence of domestic abuse and VAWG laid out in this response should serve as ample support for this recommendation. 73747576	

Volume 5 – What should services do to mitigate the risk of online harms

Our proposals for the Children's Safety Codes (Section 13)

Confidential? –N

Volume 5 covers the way services should mitigate the risk of online harms to children. The content of volume 5 does not pertain specifically to the work areas covered by the Domestic Abuse Commissioner's office, therefore we will not be responding specifically to this volume. However, we would like to point to the responses being submitted by the Online Safety Act Network, 5Rights, the NSPCC, the Victim's Commissioner, and the Children's Commissioner.

Please complete this form in full and return to protectingchildren@ofcom.org.uk.