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Stronger voices, safer spaces: what Ofcom's guidance misses

UK communications regulator Ofcom recently carried out a public consultation on its draft guidance on how tech platforms can take action against online harms that disproportionately affect women and girls, as required by the 2023 Online Safety Act. LSE PhD researcher Stephanie Thelwall produced a policy briefing explaining the extent of the guidance and how it could be more effective, and summarises the main points here.

Women and girls face distinct challenges to their safety. On average, a woman is killed by a man **every three days in the UK**. Online, women and girls face an array of risks: **Plan International's 2020 report on Girls' and young women's experiences of online harassment** found reported that across 22 surveyed countries, 58% of girls reported experiencing online harassment. Of this 58%, 85% reported experiencing multiple forms of harassment. Despite these striking statistics, there has been little in the way of a proportional and appropriate response to combat the particular risks to safety that women and girls face online.

In the UK, the **Online Safety Act**, passed in 2023, plays a key role in efforts to address wider harms encountered online. It requires Ofcom, the UK's communications services regulator, to produce guidance and codes to help service providers understand how to meet their obligations as required by the Act. In the past year Ofcom has been moving through cycles of draft codes and guidance, some of which have been **officially published** concluding a public consultation period. Recently Ofcom concluded a period of public consultation for its draft guidance on '**A safer life online for women and girls**'.

In line with the consistent critique of previous draft guidance and codes on protecting against both illegal harms and **harms to children**, Ofcom has once again produced draft guidance that falls short of meaningfully addressing harms women and girls face.

There are two key ways in which this draft guidance fails to measure up:

- **Absence of standard setting** Despite the lengths to which Ofcom has gone to highlight the harms women and girls face in the guidance's second chapter, the regulator has failed to draw clear red lines in setting specific standards for service. The guidance simply asks service providers to 'set standards' without specifying to what end.
- **Lack of safety by design for women** Many of the proposed foundational measures only go so far as to protect against illegal harms or harms to children, rather than harms particular to women and girls. Furthermore, the proposed measures are either hyper-specific in recommending precise technological features, or are too vague to empower platforms to make meaningful changes.

These critiques will not be unfamiliar to Ofcom. Recent draft guidance and codes have garnered **similar responses** from **civil society organisations**.

If the proposed framework is implemented as it is, it might have no effect, or might even create further problems by creating the illusion of safety. Ofcom should strengthen its regulatory stance in the following ways:

1. Ofcom should set clear standards for service providers to abide by when tackling risks to women and girls online. This would include specific risk metrics for each harm area as they relate to proposed reporting and assessment duties. These should cover, for example, account suspensions for serious and repeat offenders and expectations for victim support.
2. Ofcom should create accountability mechanisms e.g., fines, that encourage platforms to take a duty of care approach. This would work in synergy with the first recommendation as it requires Ofcom to develop a **'taxonomy of harms that the duty of care [is] intended to reduce or prevent'**.
3. Ofcom should convene a stakeholder group, not only involving civil society organisations and experts, but also women and girls who are everyday users of online platforms – particularly those from marginalised backgrounds. This group should support Ofcom's deliberative work by serving as permanent soundboard about safe design, contributing to standard setting.
4. Ofcom should make abusability testing a foundational step rather than a good practice step. It should resource the establishment of an independent individual civil society 'red team' to test for significant vulnerabilities that may endanger women and girls online.
5. Ofcom should require platforms to prevent serial perpetrators from re-registering on the same platform or migrating to other platforms in a cross-platform effort to continue harmful or illegal behaviour such as child sexual abuse (given that a small number of users are often responsible for a large amount of online gender-based harm, particularly in cases of co-ordinated harassment.)

It is in Ofcom's best interests to lay strong foundations which the regulator can continue to build on to reduce potential harms. Starting off with weak foundations risks allowing service providers to establish ineffective or even harmful processes and infrastructures that are difficult or even

impossible to undo. Starting off perfect is not possible, but starting off strong is critical when the safety of women and girls is at stake.

Read the full policy brief [here](#).

This post gives the views of the author and not the position of the Media@LSE blog, nor of the London School of Economics and Political Science.

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