

## **VAWG Principles for the Online Safety Bill**

As organisations and experts in violence against women and girls (VAWG) we believe that the Online Safety Bill must take a rights based approach that centres the right to access online spaces free from harassment, abuse and threats. To achieve this, the Bill must recognise and explicitly name online VAWG in all its forms.

Women and girls, particularly those from minoritised and marginalised communities, already remove themselves from online spaces, refrain from expressing their views and have to exercise a degree of “safety work”<sup>1</sup>, that inhibits and curtails their experiences and free expression. Online VAWG is silencing women, leaving them unable to navigate the online world to learn, work, communicate and grow, free from threat and abuse.

*“Going through all of this has had a profound impact on my life. I will never have the ability to trust people in the same way and will always second guess their intentions*

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<sup>1</sup> Vera-Gray, F. & Kelly, L. (2020) Contested gendered space: public sexual harassment and women’s safety work. *International Journal of Comparative and Applied Criminal Justice*  
<https://www.tandfonline.com/doi/full/10.1080/01924036.2020.1732435>

*towards me. My self confidence is at an all time low and although I have put a brave face on throughout this, it has had a detrimental effect on my mental health.” – Ellesha, survivor of image-based sexual abuse*

Online VAWG refers to acts of violence or abuse that we know disproportionately affect women and girls and is a wide and ever growing set of behaviours, as perpetrators use the online world in order to perpetrate harm in addition to the online space being a context where new forms of VAWG have been created.

Online VAWG includes but is not limited to online stalking, online harassment including sexual harassment, grooming for sexual purposes, online threats and abuse including rape threats, domestic abuse perpetrated online also known as tech abuse, doxxing and image-based abuse.

The harms of online VAWG are severe, myriad and cumulative. The impacts include mental, physical and psychological trauma. The impacts also relate to a loss of opportunities and access to education, work, communities, support and information, both online and offline. The effects can be long lasting, wide-ranging and have been described as “shattering lives”.<sup>2</sup>

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<sup>2</sup> McGlynn, C. et al., (2019) Shattering Lives and Myths: A Report on Image-Based Sexual Abuse.

These forms of abuse should be recognised as related to one another because they have common drivers: women's and girls' persistent inequality, and other inequalities which intersect with this. Online VAWG should be understood as part of the wider continuum of Violence Against Women and Girls, with the online space as a context for VAWG being perpetrated offline as well.

As Clare McGlynn and Erika Rackley<sup>3</sup> point out, rape porn and image-based abuse, as well as harming the individual 'victim' in a deeply gendered way, also cause 'cultural harm', in that they 'may help to sustain a culture - a set of attitudes that are not universal but which extend beyond those immediately involved as perpetrators or victim-survivors of image-based sexual abuse—in which sexual consent is regularly ignored'.

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<https://claremcglynn.files.wordpress.com/2019/10/shattering-lives-and-myths-revised-aug-2019.pdf>

<sup>3</sup> McGlynn, C and Rackley, E. (2017) Image-Based Sexual Abuse. Oxford Journal of Legal Studies 37(3): 534-561  
<https://dro.dur.ac.uk/20260/>

## Key Statistics

- Women are 27 times more likely to be harassed online than men.<sup>4</sup>
- 1 in 5 women in the UK have been subject to online harassment or abuse.<sup>5</sup>
- Black and minoritised women and non-binary people were more likely to report suffering increased online abuse during COVID-19, with 38% saying that the context of the pandemic had led to increased online abuse.<sup>6</sup>

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<sup>4</sup> European Women's Lobby (2017) Her Net Her Rights – Mapping the state of online violence against women and girls in Europe

[https://www.womenlobby.org/IMG/pdf/hernetherrights\\_resource\\_pack\\_2017\\_web\\_version.pdf](https://www.womenlobby.org/IMG/pdf/hernetherrights_resource_pack_2017_web_version.pdf)

<sup>5</sup> Amnesty International UK (2017) Online abuse of women widespread in UK <https://www.amnesty.org.uk/online-abuse-women-widespread>

<sup>6</sup> End Violence Against Women Coalition and Glitch (2020) The Ripple Effect: Covid-19 and the Epidemic of Online Abuse <https://glitchcharity.co.uk/wp-content/uploads/2021/04/Glitch-The-Ripple-Effect-Report-COVID-19-online-abuse.pdf>

- Refuge's report [The Naked Threat](#) evidenced that 1 in 7 young women have experienced threats to share their intimate images or videos.<sup>7</sup>
- [85% of women](#) who experienced online abuse from a partner or ex-partner said that it was part of the pattern of abuse they also experienced offline.<sup>8</sup>
- [83% of women](#) who had experienced threats to share their intimate images from a current or former partner experienced other forms of abuse, including over a quarter who experienced sexual abuse.<sup>9</sup>
- Latest data on image-based sexual abuse showed that [82% of image-based abuse prosecutions](#) were flagged as being domestic abuse-related.<sup>10</sup>

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<sup>7</sup> Refuge (2020) The Naked Threat

<https://www.refuge.org.uk/wp-content/uploads/2020/07/The-Naked-Threat-Report.pdf>

<sup>8</sup> Women's Aid (2021) Research on Online Domestic

Abuse <https://www.womensaid.org.uk/information-support/what-is-domestic-abuse/onlinesafety/>

<sup>9</sup> Refuge (2020) The Naked Threat

<https://www.refuge.org.uk/wp-content/uploads/2020/07/The-Naked-Threat-Report.pdf>

<sup>10</sup> Office for National Statistics (2020) Domestic Abuse and the Criminal Justice System, England & Wales: November 2020

<https://www.ons.gov.uk/peoplepopulationandcommunity/cr>

- [Almost a quarter](#) (23%) of girls aged 11 to 16 and a third (33%) of young women aged 17 to 21 have been harassed online in the last year. This is higher for LGBTQ girls and young women: 42% compared to 24% who are straight. Disabled girls and young women are also more likely to be harassed online with two in five (40%) aged 11 to 21 saying so compared to 25% of those without disabilities.<sup>11</sup>
- [A fifth](#) (19%) aged 11 to 16 have been sent unwanted sexual images — increasing to a third (33%) of 17 to 21s.<sup>12</sup>
- [1 in 8 titles](#) shown to first time viewers of the most popular pornography websites in the UK describe sexual activity that constitutes sexual violence (whilst also being in contravention of their own - essentially meaningless - terms and conditions).<sup>13</sup>

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[imeandjustice/articles/domesticabuseandthecriminaljusticesystemenglandandwales/november2020](https://www.meandjustice/articles/domesticabuseandthecriminaljusticesystemenglandandwales/november2020)

<sup>11</sup> Girl Guiding (2021) Girls' Attitudes Survey

<https://www.girlguiding.org.uk/globalassets/docs-and-resources/research-and-campaigns/girls-attitudes-survey-2021-report.pdf>

<sup>12</sup> Ibid.

<sup>13</sup> Vera-Gray, F., McGlynn, C., Kureshi, I. and Butterby, K. (2021) Sexual violence as a sexual script in mainstream online pornography, The British Journal of Criminology

<https://doi.org/10.1093/bjc/azab035>

*“I reported the situation to the police and went in search of more evidence. What I found showed a number of websites dedicated to non-consensual pornographic content and online forums designed to cater for the anonymous sharing of explicit content. It showed a trail of evidence that suggested that my situation was not a one-time act but a prolonged behaviour – my ex-partner has, in all likelihood, been engaging in non-consensual image sharing for a number of years without my knowledge.” - Georgie, survivor of image-based sexual abuse.*

## **Key Recommendations**

The following are key recommendations that our organisations believe are necessary to ensure the Online Safety Bill tackles online VAWG in all its forms:

- **Recognition of online VAWG as a specific harm in the Bill**, with an accompanying Code of Practice developed in consultation with the VAWG sector to set clear expectations for how online VAWG cases are investigated and clear, consistent online VAWG reporting standards for platforms. The definition of online VAWG in the Bill must recognise the intersecting ways abuse can affect different women and girls.

- **Meaningful engagement by Ofcom in their policy development with the specialist ‘by and for’ led sector** in recognition of the wider impact of online harms on women who experience the material and lived reality of structural inequality and discrimination. This recognition must also be reflected in the definition of “an adult of ordinary sensibilities” which should be considered within a trauma informed, intersectional and gendered framework.
- **Inclusion of all forms of image-based sexual abuse as harmful within the Bill with commercial porn websites specifically named in the Bill** and subject to a higher level of scrutiny by a regulator that is empowered to issue take down notices. Criminalisation of image-based sexual abuse offences must not include a motivation requirement and anonymity must also be automatically granted to all victims.
- **10% of the revenue raised from the Digital Services Tax ring-fenced to fund specialist VAWG sector efforts to effectively address online VAWG, with 50% ring-fenced for specialist ‘by and for’ led services for Black and minoritised women and girls.** Alternatively, 5% of any fines levied by Ofcom to be directed to funding specialist VAWG sector support services, and for 50% of this amount to be specifically ring-fenced for specialist ‘by and for’ led

services supporting Black and minoritised women and girls.

- **Transparency reporting to include a separate VAWG category and a requirement for tech companies to be more transparent about their content moderation** and allow trusted research institutions and civil society organisations to access anonymised and disaggregated data about content removals, complaints, appeals process and sanctions imposed.
- **A robust, effective and proactive regulator with the power and resource to order the take down of image-based sexual abuse and harmful content and provide an effective challenge to cross-industry tech companies.** For an independent regulator to be committed to developing a specialist knowledge base relating to online VAWG with engagement and scrutiny from third sector specialists in online VAWG.
- **A new high level principle requiring a company to take into account, and to address and reasonably mitigate against potential harms,** alongside ethical frameworks and online harm analysis when designing software and devices that ensures the default setting is safest for all potential users to navigate, and the least likely to nudge and encourage users into participating in forms of online hate or abuse. Any

mechanisms and settings for managing and reporting content must be accessible and appropriate for all disabled people. Platforms provide ideal ‘conducive contexts’ for individuals and groups to harass and abuse with impunity. When the potential for serious harm and abuse is clear at design stage, it should be acknowledged by the company and mitigated against. Co-design and training from the specialist VAWG sector for the tech industry to help identify potential opportunities for abuse should be seen as best practice

- **A commitment to ‘future-proofing’ in the area of online harms including online VAWG regulation,** to ensure that in particular the ever-growing use of AI and other ways in which online harms will be perpetrated in future are within scope of the emerging policy and the regulator’s powers. The inclusion of digitally altered fake porn/deepfake images or video recordings in a definition of image-based sexual abuse offence would assist in ‘future-proofing’.

*“The online world is scarier now.. [I] have become very protective of my online presence. I create social media content for my job and work as an actress which means I have an extensive online presence. I am scared that one day, my ex or one of his “friends” will find a way to make my career choices impossible. That they will seek to humiliate me by sharing images of me in my virtual place*

*of work. This is not a paranoid fear – this is a tangible possibility.” – Georgie, survivor of image-based sexual abuse*

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