



Women and Equalities Committee

Tuesday, 23 April 2024

Dame Melanie Dawes
Chief Executive, Ofcom

[by email]

Dear Melanie,

Non-consensual intimate image abuse

As you may be aware, over the course of this Parliament, the Women and Equalities Committee has undertaken a programme of work looking at tackling violence against women and girls. The Committee recently attended the UN Commission on the Status of Women, during which we engaged in a number of meetings relating to non-consensual intimate image abuse (in some cases referred to as 'revenge porn').. Some of the concerns raised with us relate to Ofcom's draft guidance for implementation of the Online Safety Act, which I would very much appreciate your thoughts on.

Mandatory removal of all non-consensual intimate image abuse

The non-consensual sharing of intimate images causes significant harm and trauma to the victim, and the resharing of an image can increase its reach exponentially. The Online Safety Act captures resharing and onward sharing of an intimate image where the individual depicted did not consent as an offence. However, the approach in Ofcom's draft guidance appears to treat reposts and shares as 'new content' for illegal content judgment. This means that platforms, on being informed of the presence of a non-consensual intimate image, would not be required to take down every instance of that image as part of one 'case' and would, instead, review each occurrence of the image as an individual case – potentially delaying the image's removal.

Will Ofcom strengthen its stance to mandate the immediate removal of known non-consensual content across platforms, including reshares and reposts, ensuring rapid response to protect victims from ongoing harm, regardless of whether the poster knows that image has been shared without consent?

Will there be specific measures or penalties introduced to enforce compliance, particularly given the historical challenges in relying on platforms to voluntarily take swift action?



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Mandatory Adoption of Protective Technologies

The Committee recently wrote to a number of platforms and tech companies to ask why they do not currently adapt preventative approaches, such as that offered by StopNCII.org via hashing. What steps will Ofcom take to mandate platforms to adopt such protective technologies that have proven to be effective in safeguarding against gender-based digital violence?

I would be grateful for your response by 1 May. I apologise for the short turnaround, but the Committee will be taking evidence on this issue the following week and it would be most useful to have your views in advance of that session.

I will be placing this letter, and your response, on the Committee's website in due course.

With best wishes,

Rt Hon Caroline Nokes MP
Chair, Women and Equalities Committee