



SUBMISSION TO THE PUBLIC ACCOUNTS COMMITTEE INQUIRY INTO VIOLENCE AGAINST WOMEN AND GIRLS

1. We welcome the publication of the National Audit Office's recent report on Violence Against Women and Girls (VAWG) and the Public Accounts Committee's inquiry. We note that senior officials from the Home Office, MHCLG and DfE have been called to give evidence at your [upcoming hearing](#). This submission is focused on the gaps in the NAO's report - most notably around the online dimension to VAWG - and, consequentially, the likely gaps in the PAC Committee's understanding of the work needed across government to tackle VAWG holistically. We are concerned that this will lead the Committee to a partial assessment of the future challenges for the Government and omit a key Department from any recommendations for the cross-government action required. **We would therefore recommend upfront that the Permanent Secretary for the Department for Science, Innovation and Technology is invited to attend the Committee hearing, along with her colleagues from the HO, MHCLG and DfE, to address these issues that fall within her remit.**
2. The Online Safety Act Network brings together over 70 civil society organisations, campaigners, academics and advocates with an interest in the implementation of the Online Safety Act 2023 (OSA). More details about our work are [here](#). The Network continues the work carried out by Professor Lorna Woods OBE, William Perrin OBE and Maeve Walsh at [Carnegie UK](#) during the passage of the Online Safety Bill: Professor Woods' proposal for a "duty of care" to address online harm reduction formed the basis of the OSA; and the Carnegie team supported Members, Peers and Select Committees during the Bill's passage, gave evidence to Parliamentary inquiries and Bill Committees and were acknowledged by Parliamentarians in both Houses for their contribution.
3. We note that the NAO report's remit is retrospective, "examining the Home Office's leadership of the 2021 "Tackling Violence Against Women and Girls" Strategy (the VAWG Strategy) and the 2022 "Tackling Domestic Abuse Plan" (the Domestic Abuse Plan), to identify lessons to support the delivery of the government's ambition to halve violence against women and girls". The NAO report is aimed at the Home Office, "who will lead this mission and is developing a new VAWG strategy."

4. Given that forward-looking agenda, we are concerned that there is just one reference to the online dimension of VAWG (at para 1.8): "The societal landscape against which these crimes are committed has also become increasingly complex and in recent years online harms (such as revenge porn) have been recognised as crimes in themselves (paragraphs 1.2, 1.4, 1.7 to 1.9 and Figures 1 and 2)" There are a few further references to "revenge porn" and no mention on the Pornography Review (which is [due to be published](#) on the day the deadline closes for submission to this inquiry).
5. We would contend then that the recommendations the NAO makes - and the focus of the PAC's inquiry - are missing a vital component of the landscape in which the Government needs to act and, crucially, the fact that the Home Office's strategy has to involve substantive action from DSIT if it is to be a success. DSIT has responsibility not just for the online safety policy and legislative agenda, which includes Ofcom's delivery of Online Safety Act guidance for protecting women and girls ([published on 25 February](#)), but also for managing the relationship with the tech companies who will have to significantly up their game if the tide of online VAWG and its impact on offline attitudes, threats and harms to women and girls, is to be addressed. The increasing use of AI-enabled tools to harm women and girls only adds to the risks of harm - and societal damage - caused by the tech sector and the costs to the Government in addressing it.
6. We have been strong advocates of the "polluter pays" principle in relation to online harm reduction - see [one of the earliest blogs](#) on the "duty of care", which influenced the Online Safety Bill's approach, published by Prof Woods and William Perrin in 2019 at Carnegie UK. The Government is picking up the costs of the tech companies' failure, over many years, to take online VAWG seriously. Cross-government action therefore has to go upstream to stem this tide; otherwise the remedial actions and financial costs that are falling to the HO (crime reduction, policing), MOJ (costs to CJS), MCHLG (community cohesion) and DfE (impacts on misogynistic and incel influencers on the safety of female staff and students) will continue to spiral.
7. From our perspective, we do not see any evidence that DSIT is prioritising its role in this space: indeed the messaging and rhetoric from the Secretary of State and his Ministerial team is primarily focused on "unleashing" innovation while "waiting to see" if Ofcom's implementation of the Online Safety Act will be effective (we along with our civil society partners would suggest not - see our [joint letter to Dame Melanie Dawes](#) re their illegal harms consultation and our joint consultation response to their [children's codes consultation](#)). **We would strongly advise the PAC committee that they need to ask the Home Office for details on how they are working with DSIT on this agenda.** We note, for example, that the [Permanent Secretary's letter](#) to the Home Affairs Select Committee chair of 4 February, responding to the NAO report, made no mention of DSIT or the online dimension to VAWG when he set out the Department's work on its VAWG strategy.
8. **We would also strongly recommend that the DSIT Permanent Secretary is invited to the hearing on 17 March to account for how she is preparing her Department to contribute to the**

cross-government Mission and what conversations she has had with her Secretary of State about the resources required to do this. If the Permanent Secretary is not able to attend the inquiry, we suggest that the Committee Chair writes to her to seek information - as below - to inform the PAC Committee report.

9. On resources, we would suggest that the PAC Committee asks DSIT the following questions:
 - Resourcing for online safety policy teams:
 - i. what the headcount was for these teams in DCMS before the machinery of government change that created DSIT in February 2023
 - ii. what the headcount was at Royal Assent for the OSA in October 2023
 - iii. what the headcount is now.
 - iv. How many DSIT staff have a specific policy role or specialism relating to online VAWG and the delivery of the Government's Mission.
10. On their role influencing and overseeing the tech sector, we would suggest that the PAC Committee asks DSIT the following questions:
 - What recent conversations the Permanent Secretary or her officials have had with tech companies about online VAWG.
 - What recent conversations she or her officials have had with Ofcom about their VAWG guidance.
11. On their role within the Government's strategy to halve VAWG within 10 years, we would suggest that the PAC Committee asks DSIT the following questions:
 - Which Minister leads on cross-governmental work to deliver the Government's Mission and what recent activities have they undertaken to contribute to this?
 - Why the publication of the Pornography Review was delayed for so long?
 - How DSIT will lead and resource the cross-government implementation of the Pornography Review's recommendations?
 - How will their leadership on implementing the Pornography Review recommendations align with the cross-government leadership and delivery of the VAWG strategy?
 - What assessment she has made of the resourcing requirements for the delivery of the Pornography Review?
 - How DSIT's online safety policy and OSA implementation work fits with her Department's responsibility for the safety and security of connected devices (for example smart domestic devices which can be used by perpetrators for stalking or coercive control purposes)?
 - How her Department coordinates with the Foreign Office - particularly in relation to risks from foreign interference and gendered disinformation; we note that the FCDO signed the [recent Global Partnership statement](#) etc.

12. We are happy to provide further background information on the issues above prior to the hearing on 17 March. We are also sending this submission to the Chairs of the Women and Equalities, Home Affairs and Science, Innovation and Technology Committees.

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