RESPONSE TO THE WOMEN AND EQUALITIES COMMITTEE INQUIRY INTO MISOGYNY: THE MANOSPHERE AND ONLINE CONTENT

Background

1. The Online Safety Act Network works with over 70 civil society organisations, campaigners, academics and experts with an interest in the effective implementation of the Online Safety Act (OSA). The Network continues the work of Carnegie UK[1] during the passage of the Online Safety Bill, providing policy advice, support and analysis on online harms for civil society organisations, policymakers and Parliamentarians on a cross-party basis.[2]

2. The input of Carnegie UK and Prof Lorna Woods OBE - now the OSA Network's expert legal adviser and the architect of the "duty of care" proposal for online safety regulation which provides the legislative underpinning for the OSA - was instrumental in the development of the code of practice on online violence against women and girls[3] and the successful subsequent campaign to amend the Online Safety Bill to include greater protections for women, which resulted in the addition of a requirement on Ofcom to produce guidance on Violence Against Women and Girls. Prof Woods has given evidence to numerous Select Committees during the course of the legislation's development, including appearing in front of the Women and Equalities Committee in its inquiry into Non-Consensual Intimate Image Abuse in November 2024.[4]

3. This submission, authored by Prof Woods, builds on our expertise in online safety regulation and focuses in particular on the definition of misogyny in this context and the legislative gaps in the Online Safety Act 2023 which allow misogynistic content to flourish in online spaces.

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[1] https://carnegieuk.org/programmes/online-harms/
[2] Our work is available here: https://www.onlinesafetyact.net/
[3] https://carnegieuk.org/publication/violence-against-women-and-girls-vawg-code-of-practice/
[4] https://committees.parliament.uk/event/22032/formal-meeting-oral-evidence-session/

Definitions of misogyny

4. Misogyny is a broad but ill-defined concept, characterised by dislike, prejudice, malice or contempt for women and girls.[5] Variations in definitions may arise in part because different disciplines each gravitate towards a particular language. Other terms overlap with misogyny, notably Violence Against Women and Girls (VAWG) and Online Gender-Based Violence (OGBV) (in all its forms) and hate speech. But arguably misogyny is broader. What follows is an overview of some of the themes and suggestions from existing literature from a range of bodies: NGOs, academics of various disciplines and government bodies. It is not, however, a full or systematic review but serves to give a sense of the breadth of the possible terrain.

5. Some authors argue for a distinction between sexism and misogyny – where misogyny punishes women who do not obey social norms while sexism rationalises male dominance through beliefs, theories, stereotypes, and cultural narratives that portray women as naturally inferior[6].   Whether this distinction, or the idea of hostile sexism, adequately catches the aspect of hate that many see as forming part of misogyny is debatable. That aspect has been called a "virulent strain of violence and hostility towards women in online environments," or "networked misogyny"[7].

6. While it may reflect the fact that misogyny is endemic in society, online misogyny can be seen manifesting online in the following ways. Khoo's list of technology-facilitated gender-based violence, abuse and harassment included: doxing; hate speech; threats and intimidation; trolling; voyeurism; impersonation; spying and monitoring; online mobbing; coordinated flagging campaigns; sexual exploitation resulting from online luring; defamation; non-consensual intimate images (NCII); deepfakes and cheapfakes; sextortion and stalking.[8] Other examples include online sexual communications (including cyberflashing)[9]; exclusion from digital spaces (eg sidelining women in certain spaces such as games or tech forums); and gendered slurs.

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[5] See eg commentary by A Allen "Feminist perspectives on power" in Zalta E (ed) The Stanford encyclopedia of philosophy (2021: Metaphysics Research Lab, Stanford University)
[6] See Kate Manne "Down girl: the logic of misogyny" (2017: Oxford University Press)
[7] Sarah Banet-Weiser and Kate M Miltner "#MasculinitySoFragile: culture, structure, and networked misogyny" (2016) 16(1) Feminist Media Studies 171-4
[8] See Cyntha Khoo "Deplatforming Misogyny: Report on Platform Liability for Gender-Based Violence" (2021)
[9] Ofcom, Guidance -A Safer Life Online for Women and Girls: Practical Guidance for Tech Companies, 25 February 2025, para 2.14, https://www.ofcom.org.uk/siteassets/resources/documents/consultations/category-1-10-weeks/consultation-on-draft-guidance-a-safer-life-online-for-women-and-girls/mains-docs/annex-a-draft-guidance.pdf/v=391669

7. Misogyny can encompass: disrespect and demeaning attitudes (belittling, mocking or insulting women – as can be seen in the treatment of the victorious Lionesses[10] and the impact on others in the aftermath of their success[11]); objectification (reducing women to their appearance and as objects of sexual gratification without agency); dehumanising (as often seen in Incel terminology (eg "foid"); controlling/limiting women's agency (eg imposing gender roles and being hostile to women's success); reinforcement of stereotypes; and harassment/aggression[12]. The so-called "manosphere" seems to have had an impact on mainstreaming retrograde views.[13] The ubiquity of pornography has seemingly had an impact on views on relationships as well as status and treatment of women.[14]

8. A review of the literature in Nature[15] suggests that both the values of a misogynistic culture and the possibilities for its reproduction and dissemination are embedded in the design and architecture of digital platforms.[16] There is a distinction between general purpose platforms which, while they facilitate large amounts of misogyny, are not set up with that as their main purpose, and other (usually smaller) sites which are established with the specific aim of disseminating misogyny and gender-based hate[17]. Even on general social media platforms, which prioritise engagement-driven content, sensational, polarising or controversial posts (which are often misogynistic) gain traction. Content creators who spread hate speech or gender-based harassment are sometimes rewarded with visibility and profits because their posts generate high levels of interaction, even if the interactions are negative[18]. This structural issue amplifies misogynistic voices and makes it harder for women to escape the reach of harmful

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[10] https://www.independent.co.uk/news/uk/home-news/fara-williams-online-abuse-football-lionesses-b2410683.html

[11] https://inews.co.uk/sport/football/sexism-football-up-after-lionesses-euro-triumph-report-2470956

[12] See also Sultana et al's 11 proposed categories: "A Rubric to identify misogynistic and sexist texts from software developer communications" in Proceedings of the 15th ACM/IEEE International Symposium on Empirical Software Engineering and Measurement (ESEM) (2021, Association for Computing Machinery, New York, NY, USA) for the longest list.

[13] See Internet Matters 2023 report: https://www.internetmatters.org/wp-content/uploads/2023/02/Internet-Matters-Childrens-Wellbeing-in-a-Digital-World-Index-report-2023-2.pdf See also Beale et al "A Diachronic Cross-Platforms Analysis of Violent Extremist Language in the Incel Online Ecosystem" (2024) 36(3) Terrorism and Political Violence 382-405

[14] See sexual script theory: (Simon & Gagnon, 2003, Ybarra et al 2011). See also Children's Commissioner 2023 report.

[15] https://www.nature.com/articles/s41599-024-02978-7

[16] Referring to MJ Rubio Martìn and A Gordo Lòpez "La perspectiva tecnosocial feminista como antídoto para la misoginia online" (2021) 30(3) Rev Esp Sociol

[17] See recent concerns about "com" networks: https://www.theguardian.com/uk-news/2025/mar/25/online-gangs-teenage-boys-sharing-extreme-material-emerging-threat-uk; and https://smoothwall.com/resources/the-rise-of-com-networks-and-extreme-coercion

[18] See Ging's summary of involvement of platforms in this: "Alphas, Betas, and Incels: Theorising the Masculinities of the Manosphere" (2019) 22(4) Men and Masculinities 638-57, p 643

content.

9. Khoo suggests the term "platformed misogyny" since "the characteristic features of digital platforms' design choices, business models and content moderation policies— including their embedded cultural values and politics—combine with the power of platform governance to shape the 'platformed' systemic oppression in question, in a way that makes it distinct from non-platformed manifestations" (p 3 – discussed in Part 3 of the report[19]). The term is based on Matamoros-Fernández's description of the role of platforms in racist narratives and contents in what she terms "platformed racism": it (1) evokes platforms as tools for amplifying and manufacturing racist discourse both by means of users' appropriations of their affordances and through their design and algorithmic shaping of sociability and (2) suggests a mode of governance that might be harmful for some communities, embodied in platforms' vague policies, their moderation of content and their often arbitrary enforcement of rules.

10. These problems are not new; indeed, the online aspect has been recognised for a while. The Beijing Declaration[20] dates to 1995; its Platform for Action noted that "global communication networks have been used to spread stereotyped and demeaning images of women for narrow commercial and consumerist purposes"). Violence against women and girls (including psychological violence) was recognised as an endemic problem. Academic work on online misogyny can be seen from 2007 onwards[21]; Gamergate took place in 2014 and around the same time studies thematised online misogyny[22]. In 2016, Demos carried out an analysis[23] of tweets over a three-week period and found 200,000 cases of misogynistic abuse – based on tweets using "slut" or "whore" (though women were perpetrators here too); and in 2017, Amnesty International carried out global research[24] on impact. There is already a trail of evidence suggesting that new tools, notably gen AI, are providing the means for new forms of abuse (eg through nudification apps) or for abuse at scale.

11. In terms of controlling misogyny, this question of scope or definition matters because the law works to more precise (sub)-categories of what potentially could be called misogyny, and imposes severity thresholds for legal acknowledgment of an issue; the Online Safety Act refers only to a sub-set of those.

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[19] As referenced above: https://www.leaf.ca/wp-content/uploads/2021/04/Full-Report-Deplatforming-Misogyny.pdf

[20] https://www.unwomen.org/en/digital-library/publications/2015/01/beijing-declaration

[21] J Filipovic "Blogging While Female: How Internet Misogyny Parallels Real- World Harassment" (2007) 19 Yale Journal of Law and Feminism 295-304

[22] EA Jane "'Your a Ugly, Whorish, Slut' Understanding e-Bile" (2014) 14(4) Feminist Media Studies 531-46

[23] https://www.demos.co.uk/wp-content/uploads/2016/05/Misogyny-online.pdf

[24] https://www.amnesty.org.uk/online-abuse-women-widespread

<u>The Online Safety Act 2023</u>

12. The Online Safety Act's safety duties are found in Part 3 of the Act and are addressed to social media (user-to-user) services (Chapter 2)[25] and to search services (Chapter 3)[26], with obligations varying to reflect the type of service provided. There are also provisions imposed on pornography providers. These are separate and more limited and are found in Part 5 of the Act.

13. The Part 3 duties break down into risk assessment and safety (or mitigation) duties. All are related to content harms, so some tech-facilitated abuse (e.g. using trackers or spyware) might not fall within the regime. The duties differ between search and user-to-user services reflecting the different nature of the services. They also differ depending on the type of content in issue.

14. There are two broad categories: illegal content, which applies to all regulated services; and content harmful to children, which applies only to services where children can access them. The safety duties distinguish between illegal content, which is in principle not tolerated,[27] and that which is harmful to children, which is not required to be taken down but just rendered inaccessible to children.[28] These two categories are further sub-divided. Both the illegal and children's categories have a base-level, general category of content defined in the Act (sometimes called non-designated content (NDC)) but additionally there are lists of identified content types called priority content (and for content harmful to children, primary priority content). The inclusion of priority content has the effect of identifying types of content that must be addressed by the regime. Beyond the illegal harms safeguards, adults are protected- but only in relation to Category 1 services[29] - by the provision of user empowerment tools and provisions requiring enforcement of terms of service (though there is no minimum threshold for such terms of service).

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[25] https://www.legislation.gov.uk/ukpga/2023/50/part/3/chapter/2
[26] https://www.legislation.gov.uk/ukpga/2023/50/part/3/chapter/3
[27] See our explainers on the illegal content search duties (https://www.onlinesafetyact.net/analysis/search-illegal-content-duties/) and user-to-user duties (https://www.onlinesafetyact.net/analysis/user-to-user-illegal-content-duties/)
[28] See our explainer on the children's safety duties: https://www.onlinesafetyact.net/analysis/the-osa-s-child-safety-duties/
[29] See our explainer on the categorisation duties: https://www.onlinesafetyact.net/analysis/categorisation-of-services-in-the-online-safety-act/

15. Some misogynistic content might trigger the illegal content duties. Relevant offences listed as priority content include threats to kill, harassment, extreme pornography and controlling or coercive behaviour.[30] Terrorism offences are included but the definition of terrorist has not been well able to cope with misogynistic terror and those with fluid ideologies; it may be that more thought needs to go in to determining the nature of this threat to determine whether such ideologies are appropriately termed terrorism. Beyond extreme pornography, pornography more generally (despite the fact that some of includes dehumanising, degrading treatment of women or glorifies sexual violence and would not be circulating freely offline) is not caught by the illegal content provisions.

16. The provisions relating to content harmful to children list pornography as primary priority content which must not be accessible to children. Additionally, priority content includes abusive content or content which incites hatred on the basis of sex; promotes serious violence against a person or depicts real or realistic serious violence against a person and bullying. All of these might be relevant to misogynistic content - though they do not entirely cover the terrain. Ofcom has defined abusive content as "content that insults, derogates, dehumanises or threatens a person on the basis of a listed characteristic"[31]. Ofcom gives the example of "[a] post or comment attacking someone based on their gender using offensive, demeaning language to describe them."[32] Objectification, in Ofcom's Guidance, includes derogatory meme or caricature of a person with derogatory language accompanying it, or the use of a "skin" applied to an avatar which incorporates a demeaning or harmful stereotype of a protected characteristic. It is unclear how far belittling content (not addressed to a particular person but, for example, framed as an abstract discussion) would be caught. Ofcom has suggested that a post which normalises, encourages or justifies extreme misogynistic attitudes and behaviours, such as expressing views that women and girls should be subjugated by men would be viewed as harmful content.[33] Is "mere misogyny" acceptable, however? Ofcom has said where alternative credible views are proposed the content overall would not be harmful.

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[30] See our explainer on the offences covered by the illegal content duties
(https://www.onlinesafetyact.net/analysis/osa-priority-illegal-content-schedules-of-offences/)
[31] Ofcom, Content Harmful to Children, p 42,
https://www.ofcom.org.uk/siteassets/resources/documents/consultations/category-1-10-weeks/statement-protecting-children-from-harms-online/main-document/guidance-on-content-harmful-to-children.pdf?v=395445
[32] Ibid, p 44
[33] Ibid, p 45

17. The protection of children provisions do allow for action to be taken in relation to a broader range of content. The difficulty with relying on the protection of children obligations to sweep up misogynistic content that does not trigger the criminal law is that such content might well remain accessible to adults. User empowerment tools[34] are available but only on Category 1 services and in relation to a limited range of content (listed in section 16[35]) which might catch some misogynistic content but not all and, in any event, depends on the user switching the tools on (though Ofcom's Guidance on Women and Girls does suggest improving default settings more generally). It is likely that these tools would be of more interest to victims than perpetrators and (some) bystanders.

18. Note that while Ofcom's draft guidance on protecting women and girls online[36] identifies five categories of relevant content, this includes both content that is illegal and content that is harmful to children because the guidance covers girls as well as women. Ofcom have determined their own definition of online misogyny, which is one of the five categories identified for the Guidance. This is defined as including the circulation of content that actively encourages or reinforces misogynistic ideas or behaviours, including content that incites hatred, abuse or threats toward women and girls, which is an open-ended definition. It also includes sexual or explicit content that normalises or encourages harmful sexual behaviour. This harm spans across illegal content such as illegal threats and extreme pornography, as well as content which is legal but harmful to children, such as content normalising gendered or sexual violence. (Ofcom Guidance, para 2.8)

19. There are some difficulties around the process of determining which sorts of content should be treated as illegal and which would be classed as harmful to children. The thresholds for the illegal content harms are high (see eg the threshold for extreme pornography), especially where a mental element requirement or the possible existence of a defence has the possibility to exclude an item of content. Ofcom's Illegal Content Judgements Guidance (ICJG)[37] seems to take a narrow approach to determining circumstances in which illegal content could be found, expecting providers to judge each

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[34] See section 15 https://www.legislation.gov.uk/ukpga/2023/50/section/15
[35] See section 16 https://www.legislation.gov.uk/ukpga/2023/50/section/16
[36] https://www.ofcom.org.uk/online-safety/illegal-and-harmful-content/a-safer-life-online-for-women-and-girls
The consultation on the draft guidance has recently closed. We have published analysis on its proposals here, including the limitations of its approach to "safety by design", and responded to the consultation; we would also draw the Committee's attention to the transcript of a meeting with organisations from the VAWG sector on the guidance and the related statement from the sector which, at the time of writing, has not yet been published.
[37] https://www.ofcom.org.uk/siteassets/resources/documents/online-safety/information-for-industry/illegal-harms/illegal-content-judgements-guidance-icjg.pdf?v=387556

item of content individually (see Illegal Harms Vol 5, para 26.45) (though it does accept that content adjudged to be NCII should in general remain illegal content when reposted or shared by another user) and has not considered any of the non- priority offences which could be relevant to tackling items of content which fall just short of the requirements of a specific priority offence.[38]

20. Note also that the discussion of violence or the filming of attacks is not in and of itself necessarily going to constitute a crime and few of the priority offences listed are about representations of crime. One exception might be the extreme pornography offence; another, image-based sexual abuse (NCII). These have quite specific requirements which might be difficult to show. Otherwise, when looking at this issue the most relevant offences might be non-designated offences (meeting the definition in s 59 OSA). While there is a wide range of possible relevant crimes, it seems that crimes that might be particularly relevant are the Obscene Publications Act[39] and s 127 Communications Act[40] and, covering similar ground to s 127, s 1(a)(i) Malicious Communications Act[41]. Unfortunately, as noted at para 19, there is no specific guidance on either of these in the ICJG Ofcom published.

21. As regards obscenity, non-pornographic material can be caught where linked to criminal conduct; where non-criminal conduct is concerned, material might be obscene where the audience is young or otherwise vulnerable. Otherwise, the triggering of the Online Safety Act is based on the protections aimed at children. For example, showing a video of a domestic violence incident (eg women being knocked out) is not necessarily criminal but probably falls into one category of priority content harmful to children (ie depicts real or realistic serious violence against a person).

22. Gendered dis- and misinformation is much more difficult to tackle, as is content aimed at maintaining stereotypes and gendered social roles. For some mis- and disinformation, some of the criminal offences might be relevant (the foreign interference offence[42], the false communications offence[43]), but much of the pick-up artist material or antifeminist content is unlikely to clear this threshold. Some of this material might, of course, be dealt with as content harmful to children. Should services wish to take action about this

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[38] See Prof Woods' detailed analysis of the illegal content judgement guidance here:
https://www.onlinesafetyact.net/analysis/ofcom-s-illegal-content-judgements-guidance/
[39] https://www.legislation.gov.uk/ukpga/Eliz2/7-8/66/contents
[40] https://www.legislation.gov.uk/ukpga/2003/21/section/127
[41] https://www.legislation.gov.uk/ukpga/1988/27/section/1
[42] https://www.legislation.gov.uk/ukpga/2023/32/part/1/crossheading/foreign-interference
[43] https://www.legislation.gov.uk/ukpga/2023/50/section/179/enacted

sort of content where adults are users, according to section 71, they can only do so if their terms of service provide for them to do so. There is nothing to stop the service reducing the protections provided by its terms of service[44]. Another part of the problem here is that platforms have, in general, an inadequate approach to defining content harmful to women and girls and so some material that is misogynistic might well not be included. It is not clear what the position is where a service has retained a catch-all right to remove down rank or remove content it deems contrary to the interests of the service's community.

23. A final consideration is the sorts of measures that platforms and search services should be expected to take. The Ofcom Codes focus heavily on ex post interventions and content takedown. While this is important (and in the case of content such as NCII, vital that it happens fast), such measures are only part of the picture. There should be a greater emphasis on safety by design[45] – and in particular checking for the abusability of features. We note that this forms part of the Guidance that Ofcom is consulting on in relation to women and girls. This is significant but the measure is not mandatory. One notable absence is measures around tackling the business model that incentivises some actors to produce misogynistic content. While Ofcom has noted the need to look at recommender tools in its Code on Children and in its Guidance on Women and Girls, the business model more generally is not challenged.

Conclusion

24. In summary, there are both definitional and legislative limitations to addressing the type of abusive content and activities online which directly target women and girls and which, in aggregate and unchecked, risks normalising misogyny within both online and offline spaces.

25. The Government has within its gift the power to amend the Online Safety Act – and to do so fairly speedily – to reduce the risk and impact of these behaviours.

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[44] See for example, the recent rolling back of protections by Meta in its revised hateful conduct policy, which now permits women being called "household objects"; here's our commentary on the issue: https://www.onlinesafetyact.net/analysis/meta-s-rollback-of-protections-for-users-why-the-uk-government-needs-to-act-and-fast/

[45] See Prof Woods' detailed commentary on what "safety by design" means in the context of the Online Safety Act: https://www.onlinesafetyact.net/analysis/safety-by-design/

Recommendations for OSA amendments

26. As a minimum, we believe the Government must make it clearer to Ofcom that services should be able to take down and keep content down, but also that in order to take up-stream actions to reduce incentives and virality of content, the definition of illegal content should not be so closely linked to existence of a criminal offence in the case of each post. This will require an amendment to the OSA.

27. In addition, we previously submitted a number of recommendations for such targeted amendments to the Government[46] and include the most relevant here for the Committee's consideration. We would be happy to provide more detail – and proposed drafting - to support any of these which are of particular interest to the Committee.

   o Introduce minimum standards of terms of service for category 1 social media and search, e.g. for Equality Act protected characteristics, to provide a baseline of protections for users in the UK.

   o Insert a "no rolling back" clause to maintain Terms of Services protections for users in the UK as they were at Royal Assent.

   o Introduce a requirement for Ofcom to produce a code of practice on safety by design, to deliver the objective set out in section 1 (3) and to focus more on harm caused by features and functionalities. This would underpin the existing, largely content-focused codes.

   o Remove the requirement in Schedule 4 for measures to be "clear and detailed", which is contributing to Ofcom's high evidential threshold and limiting the scope of the codes.

   o Upgrade the VAWG guidance to a code of practice to make it enforceable.

   o Amend the categorisation regulations to ensure the intent of the Act - that category 1 includes small, risky platforms - is delivered.

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[46] See our letter to Baroness Jones: https://www.onlinesafetyact.net/documents/207/annex-a-osa-network-letter-to-baroness-jones.pdf