Victim Support Scotland

A Safer Life Online for Women and Girls

Ofcom Call for Evidence 2026

Victim Support Scotland is a national organisation dedicated to supporting victims and witnesses of crime. As Scotland's largest victims' organisation, people impacted by crime have access to our services right across the country. We are a listening ear when people need to talk to someone about the impact of crime, we provide practical support such as when people need a safety plan to feel secure in their home and we give access to critical crime-related emergency funds in their time of need.

We play a crucial role in delivering victim-centred support, and this in turn drives our forceful and successful lobbying and campaigning for change within the criminal justice system. As an organisation rooted in the experiences of victims and witnesses, we aim to ensure that their voices are central to the development of policy and practice.

Background to the Call for Evidence

Call for Evidence: A Safer Life Online for Women and Girls

Women and girls' online safety is a priority for Ofcom, and we want to understand how their experiences have changed since Guidance was published in November 2025.

This Call for Evidence invites interested stakeholders to provide Ofcom with evidence and insights about women and girls' online experiences since the publication of our Guidance in November 2025. We are particularly interested in understanding what, if any, changes women and girls have experienced online during this period.



Victim Support Scotland

What actions are services taking?

Question 1: What action has been taken by service providers since the publication of the Guidance in November 2025 to address online gender-based harms?

Answer:

Victim Support Scotland (VSS) is Scotland's leading charity for victims and witnesses of crime, providing free, confidential and person-centred support to help people cope with and recover from the impact of crime and its associated harms. VSS supports victims of all crime types, offering emotional support, practical assistance, information and advocacy throughout their journey.

As crime continues to evolve, an increasing proportion of victims seeking support have been affected by offences perpetrated online, including:

- fraud
- cyber-enabled abuse
- stalking
- harassment
- image-based harms.

This reflects the growing prevalence of digital offending and the significant emotional, financial, and psychological impact that online crime can have on victims.

Community partnerships for prescribed organisations

One way in which VSS has supported victims of crime and their families is by assisting in the removal of harmful content online. Unfortunately, the mechanisms for reporting harmful or offensive content and comments are not always effective. When using standard reporting measures, we rarely receive an outcome or response. Often, these reporting processes are difficult to access and do not provide a direct email contact.

This makes the process ambiguous, with requests not acknowledged or handled by a human working for that platform. Additionally, posts can be reported through individual accounts, but this is not replicable if you are not the owner of the account, which means that VSS is unable to do this on behalf of a victim or family.

VSS is fortunate in that it has an effective community partnership in place with TikTok, which provides a direct link to have harmful or offensive content removed alongside a personal named support contact. As part of this process, victims and families can report the distressing content to VSS, and we in turn are able to alert TikTok to the content, which can then be reviewed and deleted or accounts closed down. This means that harmful and offensive content can be escalated and dealt with swiftly.

This service provided by TikTok provides several important benefits:

- Reduces harm and distress by helping to remove content that is abusive, offensive, exploitative, or retraumatising for victims and their families.
- Provides a clear route for action to victims and families who might struggle to navigate the reporting process.
- Speeds up response, ensuring that harmful content is reviewed and, where appropriate, removed more quickly. This means that there is less time for the harmful content to be left online for the victim and others to continue to see.
- Supports an increased sense of safety and control by helping victims and families to address content which may be causing fear, alarm, embarrassment, harassment, or reputational harm.
- Helps prevent further victimisation, particularly where harmful content is being shared widely, encouraging abuse from others and prolonging the impact of the harmful content.

VSS therefore welcomes its partnership with TikTok, which enables harmful or distressing content to be escalated and addressed quickly. This benefits victims by reducing ongoing harm and limiting the spread of harmful material. The partnership also helps alleviate the burden on victims and families by enabling VSS to advocate on their behalf, supporting a more victim-centred and trauma-informed response to online harms.

> ***Case Example:***
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> *VSS recently supported a family where their child was being threatened on TikTok by a young offender who killed another child in the family. VSS was able to help the family gather evidence, complete the referral form and submit it to TikTok. As a result, all associated TikTok accounts of the young person were banned. The family told us how grateful they were that we were able to facilitate this for them.*

Victim Support Scotland believes that this functionality and prescribed status should be extended across all social media sites.

Findings from the joint Dangerous by Design report by End Violence Against Women Coalition and Refuge in September 2026 suggest that significant concerns remain regarding the effectiveness of platform reporting mechanisms and responses to harmful content. The following statistics demonstrate women's experiences of reporting online abuse to platforms:

- Over half (58%) of women who reported were not satisfied with the outcome of the report
- 54% were not satisfied with action taken against the perpetrator, such as suspending or banning them
- 59% were not satisfied with the level of support provided by the platform in relation to their safety, mental health and wellbeing.
- Many women were not satisfied with how quickly the platform responded to their initial report (54%), or how quickly the content was removed, if necessary (48%).[1]

Victim Support Scotland – Lived experience

Victim Support Scotland supported a service user through an incident of AI facilitated revenge porn. The content, which was of a sexual nature, was created by the partner of the victim and uploaded to a social media site, where it was viewed by their colleague. This colleague alerted the victim to the content.

The victim noted feeling 'mortified', extremely disrespected, and violated. The victim contacted the social media site to have the content removed and it took a further two weeks before the video was removed.

The victim reported the content to the police, but no arrest or charge was ever made as the service user could not prove it was made without their knowledge or consent and could not prove the video was made with AI. The service user eventually left their job and moved to a new city as they could not bear the thought of someone they knew potentially seeing this video.

This incident demonstrates the challenges victims can face in securing the removal of content created or shared without their consent. Where harmful content remains online for extended periods, there is an increased risk of further dissemination and exposure, which can intensify the emotional, psychological, and reputational harm experienced by the victim.

Pornography depicting strangulation

Victim Support Scotland is supportive of the recent UK Government announcement that pornography depicting strangulation and incest will be banned from November 2026. Evidence suggests that repeated exposure to such content may contribute to the normalisation of strangulation and minimise perceptions of the harm associated with it.

[1] Refuge-EVAW-Online-VAWG-Report-Sept-26.pdf - Page 24

The ban has the potential not only to reduce access to harmful content but also to send a clear public message about the serious risks associated with strangulation. We urge Ofcom to prioritise the effective implementation and enforcement of this ban to ensure that the intended safeguards can be realised. Accordingly, it is our position that the guidance be updated to include the responsibility to ensure existing content containing strangulation is removed from websites.

Devolved and Reserved Legislation

Due to the nature of devolution and devolved legislation, some aspects of the Online Safety Act 2023 do not apply in Scotland. It may be useful for this guidance to provide an explanation of how this guidance applies in Scotland and where there may be any points in which implementation of the guidance is impacted by devolved legislation.

What is different for women and girls online?

Question 2: What evidence is available on women and girls' experiences of the online gender-based harms identified in the Guidance since its publication in November 2025?

Answer:

As our world becomes increasingly digitised, reports of technology-facilitated crime continue to rise. While VSS does not routinely collect data in a way that would allow us to identify trends in prevalence since the publication of the Guidance in November 2025, evidence from the wider violence against women and girls sector suggests that online harms remain widespread and continue to evolve in both scale and complexity.

Changes in women and girls' experiences of the harms and their impacts

VSS has continued to see the real-world consequences of crimes perpetrated online. While many online harms are not new, technology has increased perpetrators' ability to target victims persistently, anonymously, and at scale. Victims increasingly report distress arising from the permanence, reach, and repeated sharing of harmful content, particularly where intimate images or personal information are involved. The potential for content to remain accessible online for extended periods can prolong trauma and create ongoing fears of revictimisation.

Changes in how women and girls engage with online services

VSS has heard indirectly from victims and witnesses who have been victims of abuse perpetrated online who are now fearful of continuing to use online platforms. Whilst VSS does not currently have direct evidence from our service users to suggest that women and girls have ceased using online platforms as a result of the harms they have experienced, evidence from the Dangerous by Design report indicates that online abuse can have a significant impact on engagement with digital spaces. The report found that 14% of women who had experienced online violence against women and girls stopped using a platform altogether as a consequence of the abuse they received,[2] highlighting the potential for online harms to restrict women's participation in online environments.

Withdrawing from online spaces in this way can compound the isolation that women can feel after an incident of online harm.

Association with actions taken by service providers

Victims continue to report frustration at trying to have content removed online and the prolonged impact this can have on them. Victim Support Scotland has experience in attempting to have content removed on behalf of victims and families, with varying degrees of success. The platform we have had most success working with is TikTok, as outlined in our answer to question 1. It is our understanding that other platforms do not offer this type of community partnership, which leaves users on these platforms without this support.

Whilst we are unaware whether Ofcom has the powers to influence this, we wished to make Ofcom aware of this good practice and the desire for it to be extended.

Are online harms changing for women and girls?

Question 3: What new evidence is available on the online gender-based harms identified in the Guidance since its publication in November 2025?

Answer:

Since the publication of the guidance, VSS has continued to see digitally perpetrated crimes occur, with victims experiencing significant psychological, physical, economic and social harms. These impacts have persisted throughout 2026 and often extend well beyond the initial offending behaviour. Findings from the Dangerous by Design report found that 36% of the women surveyed reported experiencing some form of online violence against women and girls and this rises to 47% of young women aged 16-24.

[2] Refuge-EVAW-Online-VAWG-Report-Sept-26.pdf - Page 6

Additionally, 66% of the women surveyed are not confident that the Government is doing enough to regulate AI in the context of women's safety.[3]

Our experience of supporting women and girls affected by online and technology facilitated crime shows us that online violence against women and girls is not a marginal issue, but a common feature of women and girls' digital lives. This has not changed following the publication of Ofcom's guidance in November 2025. Furthermore, this evidence demonstrates that online violence against women and girls not only has immediate effects for women and girls in generating fear, upset, and embarrassment, but it can also have consequences beyond these immediate harms by restricting women and girls' participation in online spaces.

Intimate Image based abuse

Victim Support Scotland has seen intimate image abuse evolve over the last year, and we are concerned to note findings from the Dangerous by Design report which found that 1 in 5 women surveyed reported experiencing image-based sexual abuse.[4]At VSS, our attention has been drawn to an increasing number of instances of the creation and use of 'nudify' apps. We are concerned that tools, such as Grok AI, continued to generate and post deepfake content of women and girls throughout 2026.[5] We draw attention back to the case example of AI-facilitated revenge porn outlined in the answer to Question 1. We are concerned about reports of these victims feeling 'dehumanised' and 'violated'.[6]

These experiences can have a profound impact on victims' sense of safety, privacy and dignity, particularly where intimate images have been created and shared without their knowledge or consent. The ability of AI tools to generate such content rapidly and at scale may further compound the distress experienced by victims, and make individuals feel that they have lost control over their own image and identity. We await the results of Ofcom's renewed focus on the spread of illegal intimate images and deepfakes.[7]

Additionally, although not high in number, VSS has seen some cases of image and intimate image abuse perpetrated via smart glasses and the content uploaded online.

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[3] Refuge-EVAW-Online-VAWG-Report-Sept-26.pdf - Page 7

[4] New EVAW x Refuge report reveals shocking scale of online misogyny and abuse | End Violence Against Women

[5] The Grok deepfake scandal shows the need and the possibility of policy to protect women and girls online - LSE Women, Peace and Security

[6] Woman felt 'dehumanised' after Musk's Grok AI used to digitally remove her clothes - BBC News

[7] Ofcom to crack down on spread of illegal intimate images and deepfakes, boosting protections for women and girls online

Victim Support Scotland

Whilst images gathered using smart glasses may not always be of an intimate nature, everyday encounters with women continue to be uploaded online, where women are then trolled and ridiculed for their encounter with the person wearing the glasses. For women and girls who have been filmed, as well as people who fear being the subject of such filming, they may feel the following effects:

- Privacy and safety. There is supposed to be a red recording light on the glasses to notify a subject they are being recorded, but people can alter or cover this up. This means that people cannot consent or take steps to protect their privacy.
- Effect on participation. Covert filming may cause women and girls to feel less comfortable in public places such as gyms, the beach or public transport causing them to avoid using public spaces they have every right to use and feel safe in.
- Modifying how they dress such as avoiding wearing dresses, skirts, or lower cut tops.

Whilst we understand that it is not currently illegal to film someone in public, it is essential that we recognise the harm caused to women and girls - not only by the technology itself, but also the uploading of this content. One woman who was filmed by smart glasses discovered the footage had been shared online, attracting sexually explicit, abusive, or derogatory comments. She noted that she felt panicked and scared as it was out of her control and made her afraid to go out in public.[8] Where content recorded using smart glasses is uploaded online, there may be a role for Ofcom in ensuring that platforms have effective mechanisms to identify, report and remove harmful or unlawful content.

Victim Support Scotland – Lived Experience

Victim Support Scotland supported a victim who was unknowingly filmed using Meta glasses while attending a maternity appointment. The footage was livestreamed on Instagram, revealing a pregnancy that the victim had chosen not to disclose to their former partner as they were going through divorce proceedings. After learning of the pregnancy, the ex-partner subjected the victim to escalating harassment, threats, and abuse.

Although the incident was reported, police advised that no criminal offence had been identified. The victim described the experience as having "ruined" their life.

[8] Smart glasses: 'I was secretly filmed and trolled online' - BBC News

Tragically, they later lost the baby and believed the distress caused by the incident contributed to that loss.

Given the potentially covert nature of smart glasses recording, women and girls may be particularly vulnerable to privacy violations, image-based abuse, harassment, and stalking. VSS would therefore support measures which ensure online platforms have robust processes for responding quickly to reports of non-consensual recordings and preventing the further dissemination of harmful content.

To support the above, we note that in 2025-26 an estimated 4,410 sexual crimes recorded by the police in Scotland were cyber-crimes, compared to 4,070 in 2024-25. The estimated volume of sexual crimes that were cyber-crimes has increased over the longer term from 1,100 in 2013-14.[9]

Stalking

Findings from University College London show that women, alongside young people and the LGBTQ+ community are more likely to be victims of cyberstalking.[10] Digital technologies and online platforms are increasingly being used to facilitate this type of harm. As so much of modern life takes place online, victims can experience this abuse as persistent and inescapable.

The effects of technology-facilitated stalking can extend beyond the online environment. Victims often describe feeling continually monitored or under surveillance, resulting in heightened fear and anxiety. This can restrict their ability to engage safely in online activities and may also disrupt their daily lives, relationships, employment and participation in their communities.

Victim Support Scotland – Lived Experience

One victim of online stalking was told by the Police to 'come off Facebook.' The victim noted that it is incredibly difficult to delete social media when so much of everyday life is online. They reported that they felt as though asking victims to not partake in a part of everyday life feels like victim blaming.

[9] Recorded Crime in Scotland, 2025-26 - gov.scot
[10] Cyberstalking growing at faster rate than other forms of stalking | UCL News

As women and girls are one of the societal groups most likely to be targeted by cyberstalking, timely platform response is important to prevent these harms from escalating into wider patterns of violence, including coercion and intimidation.

Where reports are made to Ofcom regarding harmful online behaviour, there must be clear consideration of how incidents that may constitute criminal conduct are identified and signposted to the Police. VSS would welcome greater clarity regarding how reports made through online safety mechanisms interact with criminal justice reporting pathways. There is a risk that victims may believe they have 'reported' an incident by notifying a platform or Ofcom, when no report has been made to the police. Consideration should therefore be given to ensuring that victims receive clear information about the options available where behaviour may constitute a criminal offence, alongside signposting to support services.

Pile-ons and coordinated harassment

Victim Support Scotland continues to see circumstances of targeted 'pile-ons' and coordinated harassment perpetrated online against women and girls. VSS has seen circumstances where a perpetrator may no longer have access to digital platforms to target victims, but their inner circle does and so they continue harassment and pile-ons against the victim on the perpetrator's behalf, particularly on social media via dedicated posts or as comments on online articles. Victims report these messages and posts to the platform. However, it can take a long time for them to be removed or often they are not removed at all. These incidents suggest that platforms have not consistently adhered to guidance on pile-ons and coordinated harassment, resulting in continued negative experiences for victims online.

There is an overarching feeling and experience that online content, both on social media and online news outlets, is becoming increasingly hostile and ungovernable. We have repeatedly heard the online world referred to as 'the wild west' where anything, including offensive, racist, misogynistic, and harmful content, can be posted with little to no repercussions for people who post such content.

It is disappointing and frustrating for VSS, victims, and their families, that harmful and distressing content continues to go unmoderated, even since the publication of guidance in 2025. Our staff note a specific rise in cases they have supported where there are significant quantities of abusive comments under online media articles or on social media. These comments largely relate to assumptions about the race of the victim, their family and people within the black and minority ethnic groups more

generally, but we know that this continues to happen against women and girls also. For example, we note the following news articles:

- Female athletes hit back at 'weird' and 'derogatory' comments about their appearance - BBC News
- I am a 15-year-old girl. Let me show you the vile misogyny that confronts me on social media every day | Anonymous | The Guardian

VSS often gets in touch with media outlets on behalf of victims to ask them to remove hateful comments or switch off comment sections on their social media channels, but this relies on the goodwill of the outlet, rather than any specific legal obligations.

AI generated content in relation to homicide

Victim Support Scotland has seen a growing number of victims and bereaved families affected by technology-facilitated harms.

We have supported families who have encountered AI-generated content depicting deceased loved ones, including videos in which a deceased person appears to recount the circumstances of their own death. On one such page viewed by VSS, it was entirely deceased women who were featured in this content, showing the gendered aspect of these videos. Families have described such content as deeply distressing, intrusive and harmful, often triggering renewed grief and trauma. In these cases, the content was created and shared without the knowledge or consent of those closest to the deceased, leaving families feeling powerless and unable to control how their loved one's memory is represented online.

Particular concern arises where AI-generated content is presented in a realistic manner. Families have reported distress at seeing viewers engage with such material as though it were genuine, creating the risk of misinformation and potentially giving the impression that relatives or friends endorse this type of content.

VSS has also supported families who discovered AI-generated images depicting the murder of a loved one circulating online. In one case, the content included inaccurate and misleading information, causing significant distress to the family. Although the content was reported to the platform, it remained accessible. Such experiences raise questions about whether existing safeguards and reporting mechanisms are sufficient to protect victims and bereaved families from harmful AI-generated content.

> ***Victim Support Scotland - Lived Experience***
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> *VSS has been supporting a family who encountered a TikTok video which contained AI generated content of a deceased family member recounting the circumstances of their death. This story was covered by STV News in 2025.*

The family in this situation described this as a deeply distressing and unsettling situation which brought a renewed sense of grief. They also described it as feeling like an intrusion on their memory of their family member. The family expressed concern that this content could be made and shared so freely - this created a feeling of lack of control which only added to their distress and negatively impacted their wellbeing.

There should be stronger protections in place to prevent this type of content being created and shared. Parallel to the family's beliefs, this type of content should be viewed as a violation of dignity and something that should not be permissible by law.

Additional consideration should be given to the potential impact on children. AI-generated depictions of deceased relatives may expose children to traumatic information in circumstances where families have chosen not to discuss the details of a death or where a child is otherwise unprepared to process such content. The potential harms in such situations are significant and should be reflected in any future policy or regulatory response.

VSS has been speaking to the Scottish Government in relation to this, noting the significant harm this causes for the family of the deceased as well as the inappropriate use of a deceased person's image more generally. It is our hope that Ofcom and the platforms it regulates take the harms caused in this context seriously and takes into consideration the impact it has.

Growth in child sexual exploitation

VSS continues to note the use of AI technology in creating and sharing child exploitation material. We have increasingly seen this type of crime in relation to AI-generated sexually explicit images of minors, with some imagery based on identifiable individuals.

In line with UK Government plans to introduce (via the Crime and Policing Act 2026), a new criminal offence that criminalises AI models that have been optimised to create Child Sexual Abuse Materials, we ask that Ofcom ensures swift and forceful monitoring and removal of such models to ensure child sexual exploitation material is stopped before it is made.

In light of this evidence, VSS is supportive of calls to strengthen the Online Safety Act and enhance Ofcom's enforcement powers, including through the introduction of legally enforceable Codes of Practice rather than reliance on guidance alone. Additionally, there must be continued consideration given to collaborative working with the Scottish Government and, where the Online Safety Act may interact with devolved legislation, to ensure that victims are not disadvantaged by gaps, inconsistencies, or differing approaches across reserved and devolved policy areas.