

Executive Summary

Gender equality and digital platforms

What role for the EU's Digital Services Act?

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Executive summary

Digital platforms have become central spaces for social interaction, participation and communication. They also play a central role in the spread of harmful and abusive content targeting women, girls and gender minorities. These issues form part of an increasingly interconnected ecosystem of actors, practices and ideologies undermining individual rights, reinforcing discriminatory gender norms and weakening democracy.

This working paper examines how online gendered harms and backlash against gender equality manifest, the role digital platforms play in shaping them, and the potential and limitations of the European Union's Digital Services Act (DSA) as a regulatory response. The analysis draws on academic and grey literature, as well as 17 semi-structured interviews with experts, policy-makers and civil society representatives across Europe. It argues that the DSA offers the EU's most significant framework to date for platform accountability and systemic risk governance, including in relation to gendered harms and gender backlash. Its effectiveness will depend on robust enforcement and the meaningful integration of gender responsiveness throughout its implementation.

Online gendered harms and gender backlash: four categories of analysis

The paper identifies four categories of online gendered harms and gender backlash. The first is gender-based hate and violence, which includes technology-facilitated gender-based violence (TFGBV), image-based sexual abuse and the activities of misogynistic online communities such as the 'Manosphere'. The second concerns the reinforcement of 'traditional' gender norms, including through 'Tradwife' and masculinity influencers who present restrictive, heteronormative gender roles as desirable or natural. The third is the suppression of gender equality content, voices and debate through opaque or biased platform moderation and the reduced visibility of feminist, LGBTQIA+ and sexual and reproductive health content. Coordinated attacks on gender equality advocates, activists and researchers constitute an important manifestation of this category. The fourth is gendered disinformation, which draws on false or misleading narratives and gender stereotypes to discredit women and gender minorities, particularly those engaged in public life. These categories are not exhaustive, nor are they mutually exclusive. A single harmful campaign may combine sexual harassment, gendered disinformation and the promotion of traditional gender roles.

The consequences of these online behaviours and forms of content extend beyond the digital environment. Targeted individuals or groups may experience psychological, economic, emotional and physical harm. Women politicians, journalists, researchers and activists are increasingly withdrawing from public debate due to online abuse and intimidation. Repeated exposure to misogynistic content can also normalise violence against women, girls and gender minorities,

as well as discriminatory attitudes in the physical world. The growing availability of generative AI on mainstream platforms adds further challenges related to scale, speed, responsibility and accountability.

How platforms shape online harms

Digital platforms are not neutral intermediaries. They are commercial actors whose advertising-driven business models reward user engagement, sustained attention and content virality. Algorithmic recommender systems privilege emotive, polarising and identity-based content, often exposing users to misogynistic material even when they have not actively sought it out, and reinforcing networks of like-minded users. Monetisation can create incentives for influencers who produce damaging, misleading or divisive content. These online dynamics help explain how narratives that were once considered fringe can become more visible, gain wider reach and gradually achieve broader social acceptance.

Other platform features also play a role. Modularity enables the rapid introduction of new services, including AI tools, sometimes without adequate safety and privacy safeguards. Anonymity can facilitate abuse and be exploited by perpetrators, creating additional challenges for accountability. Content moderation has been both insufficient in addressing gendered harms and coordinated harassment, and at times disproportionately restrictive towards gender equality-related content and voices. Uneven enforcement of platform policies across languages and contexts, limited opportunities for affected users to challenge moderation decisions and declining access to platform data for researchers and civil society organisations further inhibit accountability.

Opportunities for addressing gendered harms and gender backlash under the DSA

The DSA moves EU platform regulation beyond a predominantly liability-based approach towards broader obligations around due diligence, transparency and systemic risks. In force since February 2024, it introduces mechanisms to improve the identification and removal of illegal content and provide users with avenues to challenge arbitrary decisions. These include notice-and-action mechanisms, requirements for platforms to explain and review content moderation decisions, reporting obligations and provisions for Trusted Flaggers. The EU Directive on combating violence against women and domestic violence complements these provisions by establishing minimum criminal standards for several forms of online violence, including the non-consensual sharing of intimate images, cyberstalking and cyberharassment. The Directive must be transposed into Member States' national laws by June 2027.

The obligations the DSA places on Very Large Online Platforms (VLOPs) to assess and mitigate systemic risks are particularly relevant. Systemic risks explicitly include negative effects related to gender-based violence and extend to fundamental rights, civic discourse and electoral processes.

Unlike measures centred on individual instances of unlawful online behaviour, systemic risk obligations cover how a platform's architecture, including recommender systems, content moderation practices and design features, contributes to cumulative harms, including those that do not clearly meet the threshold of illegality. Independent audits, researchers' access to data and regulatory oversight can help expose these mechanisms and evaluate whether platforms' mitigation measures are adequate. Systemic risk obligations may also support greater scrutiny of gendered disinformation and the suppression of legitimate content related to gender equality.

Limitations of the DSA framework and challenges of enforcement

The DSA nevertheless has significant gaps. The legal definition of gendered harms remains ambiguous and varies across Member States, while many manifestations of gender backlash involve harmful but lawful forms of speech. Gendered disinformation is also not explicitly defined. The individual reporting systems introduced by the DSA can place a disproportionate burden on survivors, who may be required to repeatedly report content that reappears across multiple accounts and platforms. The DSA also does not adequately address the cross-platform nature of harmful content dissemination and the networks that facilitate it.

More fundamentally, the effectiveness of the DSA's systemic risk governance framework depends on the quality of platforms' self-assessments, the independence of external scrutiny and the capacity of public authorities to enforce obligations. To date, risk assessments have often been vague, particularly regarding gendered harms and gender backlash, raising concerns about the adequacy of both the evidence base and resulting mitigation measures. Civil society organisations and researchers have had limited involvement in risk assessments and consultations, while continuing to face significant constraints in terms of resources and access to data. These challenges are unfolding in a political environment marked by growing deregulatory pressures and a broader shift among major platforms away from commitments to safety, transparency and content moderation.

Policy priorities and recommendations

This analysis identifies five key priorities.

1. **First, EU and Member State authorities should strengthen DSA enforcement.** This includes systematically enforcing integration of gender-based violence, gendered disinformation and discriminatory content moderation and algorithmic systems into systemic risk assessments. It also requires the effective transposition of the EU Directive on combating violence against women and domestic violence, stronger coordination between EU and national authorities to enforce both regulations in conjunction and dedicated binding guidelines by the Commission.

2. **Second, EU and Member State authorities should fund and support civil society organisations and independent researchers, providing adequate resources, access to data and real opportunities to contribute to platform risk governance.** This includes participation in consultations and Trusted Flagger mechanisms, which should incorporate organisations and experts with specific gender expertise.
3. **Third, European policy-makers should resist pressure to weaken or prematurely simplify digital regulation** whose implementation is still developing and whose impacts have yet to be fully assessed.
4. **Fourth, regulators should leverage the DSA to place greater emphasis on the preventative and system safety measures platforms can take.** Platforms should be incentivised to adopt design and reporting features that give users more control over their online experience and reduce exposure to harmful content, while avoiding the transfer of safety responsibilities onto those encountering abuse.
5. **Fifth, given the transnational nature of digital platforms, the EU should integrate platform accountability and gender-responsive digital governance into its international partnerships, particularly the Global Gateway strategy, which has as one of its pillars investments in the digital sector.** The EU should ensure that investments and cooperation on digital technologies should not come at a price to gender and human rights, or amplify the risks of digital platforms. The EU should also engage in broader efforts to develop global standards for digital governance.

The DSA cannot, on its own, address the underlying social and political drivers of gendered harms and gender backlash. However, it can reshape some of the conditions through which digital platforms enable and amplify these dynamics, making it an important component of a broader response.

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