The Impact of Artificial Intelligence on Gender-Based Violence

by

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Abstract

In the modern era, the development of technology is an irreversible process. Humanity has reached a stage where artificial intelligence can perform tasks that were once possible only for humans, such as learning, problem-solving, understanding language, recognizing images and making decisions. AI can also generate photos and videos using someone's image, creating content that isn't real but appears to show events as if they actually happened.

This technological development has both positive and negative implications. This article explores its potential impact on gender-based violence.

The paper examines the nature of gender-based violence and the various forms in which it is perpetrated. It also evaluates the legal regulation of artificial intelligence on international level. It also analyzes relevant case law from the European Court of Human Rights concerning both topics.

Furthermore, the article considers both the positive and negative effects of artificial intelligence in the context of gender-based violence (including female journalists) and assesses the measures that states should adopt to mitigate its potential harms.

1. Introduction

It has been a long time since the protection of women's rights became a priority at the international level, especially within the European Union. In modern society, gender-based violence, both in physical spaces and online, has become an increasingly pressing issue. Using online platforms, women are often subjected to gender-based online violence, sexual harassment, stalking, the creation and distribution of fake intimate photos using artificial intelligence (AI) or the threat of distribution, blackmail, extortion, and more. Female journalists are particularly vulnerable to AI-generated hate crimes due to their public visibility and online presence. Gender-based online violence against them is particularly dangerous because its publicity reinforces gender stereotypes and may even serve as an example for some perpetrators.

Much of the modern technology industry is currently focused on developing artificial intelligence. At the same time, the role of these systems in everyday life is becoming more important day by day and is also helping to simplify the decision-making process in certain areas. Although the work of artificial intelligence has a positive impact on the development of various fields (for example, easily identifying online discrimination), it may also create certain threats and risks to human rights and freedoms. Accordingly, it is important to have both domestic and international legal regulations governing the development and further use of artificial intelligence systems.

Gender equality is greatly influenced by the media, the Internet, and artificial intelligence. It is essential that specific measures be taken to ensure gender equality in the use of artificial intelligence. These areas should be inclusive and they should promote social changes in a positive way.

The aim of this article is to discuss and evaluate international regulatory acts on artificial intelligence in the context of discrimination and to analyze the possible impact of artificial intelligence on gender-based violence, especially against female journalists.

This paper adopts a doctrinal legal research methodology, focusing on the interpretation of international legal instruments, including human rights treaties and conventions relevant to AI and gender-based violence. It also draws on case law from the European Court of Human Rights to examine how legal principles have been applied in cases involving online

abuse, freedom of expression and state obligations to protect individuals, particularly women, from violence and harassment. The paper is supported by secondary sources, including academic literature and policy reports, to provide broader legal and contextual insights.

The article consists of an introduction, four chapters, and a conclusion. The four chapters cover the essence of gender-based violence and its forms, the essence of artificial intelligence and the international legal norms regulating it, the impact of artificial intelligence on gender-based violence, and violence against women journalists.

2. The essence of gender-based violence and its forms of perpetration

Although the principle of non-discrimination is upheld by a number of powerful international instruments (including the Convention for the Protection of Human Rights and Fundamental Freedoms[I]), violence motivated by intolerance and discrimination remains a persistent challenge. Gender-based violence is a serious social problem and a form of human rights violation that reflects gender inequality and discrimination in society. It not only harms specific individuals, but also deepens the unequal distribution of power and stirs up structural injustice. Such violence poses significant challenges to legal systems and policies, requiring a complex and coordinated response, including preventive measures, victim protection mechanisms, and public awareness-raising.

One of the most important international documents recognizing women's rights is the UN Convention on the Elimination of All Forms of Discrimination against Women (UN 1979).[II] According to Article 1 of the above mentioned Convention, the concept of "discrimination against women" mean "any distinction, exclusion or restriction made on the basis of sex which has the effect or purpose of impairing or nullifying the recognition, enjoyment or exercise by women, irrespective of their marital status, on a basis of equality of men and women, of human rights and fundamental freedoms in the political, economic, social, cultural, civil or any other field."

Even though CEDAW does not explicitly mention gender-based violence, it addresses certain forms of it indirectly, such as forced marriage and sexual exploitation. For example, Article 3 focuses on ensuring women's full development and advancement in all fields (in

particular in the political, social, economic and cultural fields). Article 5 calls on states to modify social and cultural patterns that reinforce gender roles (to achieve the elimination of prejudices and customary and all other practices which are based on the idea of the inferiority or the superiority of either of the sexes or on stereotyped roles for men and women). Article 6 obliges states to suppress all forms of trafficking and exploitation of women. Together, these provisions illustrate how the Convention approached the structural roots of inequality, even if it did not yet define or name gender-based violence as a standalone issue.

It is noteworthy that the word "gender" appears in the Declaration on the Elimination of Violence against Women (UN General Assembly 1993).[III] In particular, in accordance with the first article of the aforementioned declaration "term "violence against women" means any act of gender-based violence that results in, or is likely to result in, physical, sexual or psychological harm or suffering to women, including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or in private life." Although gender is mentioned in the document, its concept is not clearly defined. It was implicitly addressed in the Council of Europe Convention on preventing and combating violence against women and domestic violence (Council of Europe 2011).[IV]

In a patriarchal society, women and girls are in an unequal position because of gender, in other words, as the Council of Europe Convention on preventing and combating violence against women and domestic violence addresses it, "socially constructed roles, behaviors, activities and attributes that a given society considers appropriate for women and men" (Council of Europe 2011).[V] Gender-based violence is prevalent, women's work is undervalued, and the role of women is diminished.

Violence against women is a broad term and includes gender-based violence against women as well. According to the Council of Europe Convention on preventing and combating violence against women and domestic violence, it is a "violation of human rights and a form of discrimination against women and shall mean all acts of gender-based violence that result in, or are likely to result in, physical, sexual, psychological or economic harm or suffering to women, including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or in private life" (Council of Europe 2011).[VI] Specifically, gender-based violence against women refers to violence that targets women specifically because of their gender or has a particularly severe impact on women compared to men (CEDAW 1992, §6).[VII] Therefore, gender-based crimes are committed primarily

because the victim's social expression is inconsistent with the perpetrator's perception of their sex and gender role. Accordingly, sex and gender in this context are completely different dimensions, and the circumstances of a specific crime determine the perpetrator's motivation and attitudes toward the act.

Violence against women can take various forms such as physical, psychological, sexual, and economic abuse (African Union 2003, art. 1).[VIII] Specific actions can be expressed as follows - forced marriage, stalking, female genital mutilation, forced abortion and forced sterilization, sexual harassment and so forth.

Patriarchal systems don't just exist in the physical world - they've also deeply influenced the digital space, where women and girls face widespread online abuse, and harmful ideas tied to toxic masculinity are often amplified. Online violence can lead to real-life harm, just like real-life violence can continue online. The EU Directive on combating violence against women and domestic violence outlines that "the increase in internet and social media usage has led to a sharp rise in public incitement to violence and hatred, including based on gender. The easy, fast and broad sharing of hate speech through the digital world is reinforced by the online disinhibition effect, as presumed anonymity on the internet and a sense of impunity reduce people's inhibition to engage in such speech. Women are often the target of sexist and misogynous hate online, which can escalate into hate crime offline" (European Union 2024).[IX]

Technology-facilitated gender-based violence poses a global threat to health, safety, and the political and economic well-being of not only those directly affected, but of society as a whole. It is "an act of violence perpetrated by one or more individuals that is committed, assisted, aggravated, and amplified in part or fully by the use of information and communication technologies or digital media, against a person on the basis of their gender" (IREX 2023, 5).[X]

Although both women and men can face online abuse and violence, research at the EU, international, and national levels shows that women and girls are far more likely to experience it more often, more intensely, and with more serious physical, psychological, or emotional harm (EIGE 2022, 10).[XI] An estimated 58% of young women and girls worldwide have been subjected to online harassment through social media platforms (Chowdhury 2023).[XII]

There's currently no unified legal definition of cyber violence against women and girls at the European level. However, the European Commission's Advisory Committee on Equal

Opportunities for Women and Men suggests using the following definition: "Cyber-violence against women is an act of gender-based violence perpetrated directly or indirectly through information and communication technologies that results in, or is likely to result in, physical, sexual, psychological or economic harm or suffering to women and girls, including threats of such acts, whether occurring in public or private life, or hindrances to the use of their fundamental rights and freedoms. Cyber-violence against women is not limited to but includes violations of privacy, stalking, harassment, gender-based hate speech, personal content sharing without consent, image-based sexual abuse, hacking, identity theft, and direct violence. Cyber-violence is part of the continuum of violence against women: it does not exist in a vacuum; rather, it both stems from and sustains multiple forms of offline violence" (European Commission 2020, 4).[XIII]

GREVIO's understanding of the concept of violence against women in its digital dimension encompasses both online aspects (activities performed and data available on the internet, including internet intermediaries on the surface web as well as the dark web) and technology-facilitated (activities carried out with the use of technology and communication equipment, including hardware and software) harmful behavior perpetrated against women and girls (GREVIO 2021, para. 23).[XIV]

When discussing gender-based cyber violence against women, it is important to consider the case law of the European Court of Human Rights.

One of the most important decisions on cyber-violence was delivered by the European Court of Human Rights in the case of Volodina v. Russia (Volodina v. Russia (No. 2) 2021).[XV] The case concerned the state's failure to protect a woman, a victim of domestic violence, from cyber-violence, and its failure to hold the perpetrator accountable. According to the factual circumstances of the case, the applicant's social media account was hacked, her fictitious name was replaced with her real name, and her personal data, including her passport photo and other intimate photographs, were uploaded. Subsequently, the teachers and classmates of the applicant's 12-year-old son were added as contacts on the same account. Two years after this incident, new accounts were created on other social networks, using intimate photos of the applicant. The state launched an investigation with a two-year delay, and in 2020, the police discontinued the investigation without holding the perpetrator accountable, citing the expiration of the statute of limitations.

The Court examined the case under Article 8 (the right to respect for private and family life) of the European Convention on Human Rights. It emphasized that "the concept of private life includes a person's physical and psychological integrity which the States have a duty to protect, even if the danger comes from private individuals" (Söderman v. Sweden 2013, §§78–80).[XVI] The Court notes that "the acts of cyber-violence, cyber-harassment and malicious impersonation have been categorised as forms of violence against women and children capable of undermining their physical and psychological integrity in view of their vulnerability. Cyber-harassment is currently recognised as an aspect of violence against women and girls and can take a variety of forms, such as cyber-violations of private life ... and the taking, sharing and handling of information and images, including intimate ones" (Volodina v. Russia (No. 2) 2021, §§48).[XVII] According to the court's assessment, the State's positive obligation to combat violence against women extends to both offline and online forms of abuse. The State failed to fulfil its positive obligations, and accordingly, the Court found a violation of Article 8 of the Convention.

In the case of Buturugă v. Romania, the Court explains that "cyberbullying is currently recognised as one aspect of violence against women and girls, and can take a variety of forms, including breaches of cyber-privacy, intrusion into the victim's computer and the capture, sharing and manipulation of data and images, including private data" (Buturugă v. Romania 2020, §§74).[XVIII]

In summary, gender-based violence against women remains a global challenge. This violence can take various forms, including those occurring online. With the advancement of technology, cyber violence - particularly targeting women and girls - is on the rise. The European Court of Human Rights has emphasized that states have a positive obligation to take preventive measures against such crimes. Moreover, when acts of cyber violence infringe upon the right to respect for private and family life - whether committed by state actors or private individuals - states must ensure an effective investigation is conducted and the perpetrators are identified.

3. The nature of artificial intelligence and the framework of its regulation under international law

In the modern world, technologies have become one of the main sources not only of communication, but also of receiving and distributing information. Technological progress is constantly developing and gaining even more importance over time. Nowadays, artificial intelligence is considered one of the important stages of this progress, representing a significant achievement of modern technological evolution. Like the steam engine or electricity in the past, AI is transforming our world, our society and our industry (European Commission 2018, 1).[XIX]

The rapid development of artificial intelligence has made it necessary to establish globally applicable legal framework setting out common general principles and rules governing the activities of artificial intelligence. The OECD AI Principles was the first international AI standards that was adopted in 2019 (OECD 2019).[XX] Principles defined AI system as "a machine-based system that, for explicit or implicit objectives, infers, from the input it receives, how to generate outputs such as predictions, content, recommendations, or decisions that can influence physical or virtual environments. Different AI systems vary in their levels of autonomy and adaptiveness after deployment". Recommendation of the Council on Artificial Intelligence outlined that throughout the AI system lifecycle the rule of law, human rights, democratic and human-centred values should be respected. This includes non-discrimination and equality (OECD 2019).[XXI]

In 2021, the UNESCO adopted the Recommendation on the Ethics of Artificial Intelligence (UNESCO 2021).[XXII] The Recommendation aims to provide a basis for ensuring that AI systems work for the good of humanity, individuals, societies, and the environment, while also preventing harm and promoting the peaceful use of AI technologies. One of the main objectives of the Recommendation is to protect, promote, and respect human rights and fundamental freedoms, human dignity, and equality, including gender equality (UNESCO 2021).[XXIII]

In 2022, the White House Office of Science and Technology Policy published the Blueprint for an AI Bill of Rights, outlining five key principles to protect civil rights in the design and use of AI systems (White House 2022).[XXIV] One of the key principle is algorithmic

discrimination protections, which occurs when automated systems contribute to unjustified different treatment or impacts disfavoring people based on their race, color, ethnicity, sex, religion, age, national, origin or any other classification protected by law (White House 2022).

In 2024, the Council of Europe has developed a Framework Convention on Artificial Intelligence and Human Rights, Democracy and the Rule of Law (Council of Europe 2024b)[XXV] (for the purposes of this chapter, it will hereinafter be referred to as the Convention). The preamble to the above mentioned Convention, among other basic aims, states that one of the reasons for its adoption is "concerns about the risks of discrimination in digital contexts, particularly those involving artificial intelligence systems, and their potential effect of creating or aggravating inequalities, including those experienced by women and individuals in vulnerable situations, regarding the enjoyment of their human rights and their full, equal and effective participation in economic, social, cultural and political affairs."

The definition of an artificial intelligence system is prescribed in the article 2 of the Convention. According to it, "artificial intelligence system" means a machine-based system that, for explicit or implicit objectives, infers, from the input it receives, how to generate outputs such as predictions, content, recommendations or decisions that may influence physical or virtual environments. Different artificial intelligence systems vary in their levels of autonomy and adaptiveness after deployment." Although the Convention defines what artificial intelligence is, the signatory parties of the treaty may exercise their margin of appreciation and specify its concept in their domestic legal acts without limiting its scope (Council of Europe 2024a, §§24).[XXVI]

Within the European Commission's Communication on AI, it was defined as "systems that display intelligent behaviour by analysing their environment and taking actions – with some degree of autonomy – to achieve specific goals. AI-based systems can be purely software-based, acting in the virtual world (for example, voice assistants, image analysis software, search engines, speech and face recognition systems) or AI can be embedded in hardware devices (for example, advanced robots, autonomous cars, drones or internet of things applications)" (European Commission 2018, 1).[XXVII] The term "artificial intelligence" directly refers to the presence of intelligence. However, the concept of intelligence is vague. Experts often use the concept of rationality in relation to AI, which refers to the ability to choose the best action to take in order to achieve a certain goal, given certain criteria to be optimized and the available resources (High-Level Expert Group on AI 2018, 1).[XXVIII]

In light of the Convention, it doesn't matter if the activities within the lifecycle of the artificial intelligence systems undertaken by public authorities or private actors acting on their behalf, each party should anyway apply this convention (Council of Europe 2024b, art. 3).[XXIX] It is also worth noting that legal literature is already actively discussing not only the commission of crimes involving artificial intelligence, but also crimes committed independently by artificial intelligence itself, as well as the issue of liability for such acts (Nerantzi and Sartor 2024).[XXX]

Privacy-invasive technologies are not neutral, they often affect certain groups more than others, especially those already seeking equality, who are more likely to be targeted (Thomasen and Dunn 2021, 565).[XXXI] Ensuring diversity, non-discrimination, and fairness means that AI systems must be developed and applied in ways that include diverse participants, promote equal access and gender equality, respect cultural diversity, and prevent discrimination and unfair bias as prohibited by the European Union or national law (European Union 2024, §27).[XXXII]

The Convention defines principles related to activities within the lifecycle of artificial intelligence systems. One of these principles is equality and non-discrimination. According to article 10 of the Convention, "Each Party shall adopt or maintain measures with a view to ensuring that activities within the lifecycle of artificial intelligence systems respect equality, including gender equality, and the prohibition of discrimination, as provided under applicable international and domestic law. Each Party undertakes to adopt or maintain measures aimed at overcoming inequalities to achieve fair, just and equitable outcomes, in line with its applicable domestic and international human rights obligations, in relation to activities within the lifecycle of artificial intelligence systems."

The Framework Convention obliges Parties to explore suitable regulatory, governance, technical, or other measures to address the various ways in which bias may be intentionally or unintentionally embedded in artificial intelligence systems at different stages of their development and deployment. The provision clarifies that the obligations under this article go beyond merely prohibiting less favorable treatment without "objective and reasonable justification" based on protected characteristics in relevant areas of a protected sector. Parties are expected to adopt new, or uphold existing, measures designed to address and rectify structural and historical inequalities, in accordance with their domestic and international

human rights obligations. Furthermore, where appropriate, these measures should be shaped by the perspectives of those directly affected (Council of Europe 2024a, 16–17).[XXXIII]

Artificial intelligence has already been integrated into the digital world and it is impossible to avoid its impact on both specific individuals and international organizations, especially those working to protect human rights (Szappanyos 2023, 93).[XXXIV] The European Court of Human Rights is among the most influential institutions working in the field of human rights protection. Accordingly, an analysis of the Court's approach to artificial intelligence is essential.

Although the term artificial intelligence was first used in the 1950s (McCarthy et al. 1955),[XXXV] progress was slow until recently, mainly due to the limitations of earlier computational technologies (Yigitcanlar et al. 2020, 1473).[XXXVI] That explains the reason there is still no single decision of the European Court of Human Rights that explicitly mentions artificial intelligence. However, some decisions indirectly address it and focus on automated decision-making and algorithmic systems.

In the case of S. and Marper v. The United Kingdom (ECtHR 2008a),[XXXVII] the European Court of Human Rights mentions the development of technology. The case was concerned about the storage of DNA data for indefinite time, despite the fact that the investigation had been discontinued. The Court mentioned that "the rapid pace of developments in the field of genetics and information technology, the Court cannot discount the possibility that in the future the private-life interests bound up with genetic information may be adversely affected in novel ways or in a manner which cannot be anticipated with precision today" (ECtHR 2008a, §§71).[XXXVIII] The Court explained that the protection of an individual's personal data is a fundamental aspect of the enjoyment of the right enshrined in Article 8 of the European Convention on Human Rights. Therefore, the domestic legal norms of the State must provide appropriate safeguards. Such protection is particularly essential when it concerns the automatic processing of personal data. The Court believes that if a country sees itself as a leader in developing new technologies, it has a special duty to make sure it properly balances innovation with the protection of human rights.

In another case the court emphasizes the need for the state to have clear and unambiguous norms regarding automated devices. In particular, in the Case of Roman Zakharov v. Russia (ECtHR 2015),[XXXIX] the court outlines that "it is essential to have clear, detailed rules on interception of telephone conversations, especially as the technology

available for use is continually becoming more sophisticated. The domestic law must be sufficiently clear to give citizens an adequate indication as to the circumstances in which and the conditions on which public authorities are empowered to resort to any such measures" (ECtHR 2015, §§229).[XL]

To sum up the court practice about AI, even though there are some other decisions where the court mentions technology and automatic processing of personal data, it doesn't mention the artificial intelligence explicitly and doesn't discuss its possible effects on Human Rights.

In parallel with the aforementioned practice of the European Court of Human Rights, in the latest case of Ships Waste Oil Collector B.V. And Others v. The Netherlands (ECtHR 2025),[XLI] there is a dissenting opinion of judge Serghides, who explicitly mentions AI and suggests theoretical and philosophical discussion about adopting a new Protocol on protecting artificial intelligence. Although he expresses his concerns about whether artificial intelligence itself would respect human rights, the rule of law, and the principles of democracy.

4. The potential impact of artificial intelligence on gender-based violence

Digital technology shapes how we connect with others in both our personal and public lives - affecting everything from our relationships with partners, family, and friends to how we interact with workplaces, social systems, and government services. The relationship between gender and technology is complex and constantly evolving, and this intersection raises serious concerns about the use of digital tools to perpetrate gender-based violence (Barter and Koulu 2021, 368).[XLII]

As already mentioned, some examples of online violence include cyberstalking, online harassment, trolling, and doxing; the non-consensual sharing of intimate images, cyber-flashing, and slut-shaming; threats of sexual violence and murder; deep-fakes, synthetic media, and morphing; gendered hate speech, disinformation, misinformation, and cyber smear campaigns. Gender-based violence against women can be committed by something or somebody using AI as a tool.

Artificial intelligence can have both positive and negative impacts on gender-based violence against women, depending on how it is designed, used, and implemented in the digital sphere.

One of the positive aspects of using artificial intelligence is that with the help of AI, it is possible, for example, to collect, classify, and analyze hate speech data in the digital space. At present, detecting hate speech remains a significant challenge, and manual identification is practically impossible. This highlights the need for automated detection systems (Kumarage, Bhattacharjee, and Garland 2024, 2).[XLIII] In relation to hate speech (including gender-based), artificial intelligence can be used in a way that, once integrated into social platforms, identifies and automatically deletes hateful posts. However, this approach also carries certain risks, particularly the potential interference with the right to freedom of expression.

Freedom of speech is one of the fundamental principles of a democratic society. According to many leading theories, freedom of speech cannot be limited by restricting the use of hate speech. However, according to many other opinions, this is justified. Countries that prohibit hate speech are not necessarily seen as opposing free speech, but rather as acknowledging the need to balance it against other important values. This idea of balancing can be interpreted in different ways. In European human rights law, for instance, freedom of expression is weighed against other rights, and the key task is to determine what constitutes a proportionate balance between them (Howard 2024).[XLIV]

Today, digital social networks have become the most important place for many people to express their opinions, gather information and exchange ideas with others. It is therefore essential to regulate this issue carefully. In addition to the risk that automatically removing hateful content may interfere with freedom of expression, there is also a possibility that artificial intelligence could misinterpret content, either mistakenly labeling it as hateful or failing to identify hateful material (Dietrich 2024).[XLV] Despite the challenges, with proper regulation and implementation, artificial intelligence can significantly contribute to combating hate speech.

Another potential application of artificial intelligence lies in supporting risk assessments related to gender-based violence. AI systems may be capable of predicting the likelihood of domestic and intimate partner violence affecting women and children. These tools can be used to identify individuals who are at high risk of either perpetrating or experiencing such

violence. Moreover, once a case of gender-based violence is reported, AI can assist case workers in assessing the continued risks faced by survivors and in formulating appropriate and effective safety strategies (Ward, Spencer, and Kalsi 2023, 5).[XLVI] AI can be utilized for predictive analytics to evaluate the potential risk of fatal outcomes in domestic violence situations. This technology could be adapted for use in humanitarian programs based in social work, such as gender-based violence initiatives, by helping social workers assess the severity of individual threats and provide additional resources to support cases at high risk (Spencer 2021, 16).[XLVII]

Along with the positive impact of artificial intelligence, it can be misused, which could cause significant harm. Such damage is often complex, leading to multiple negative impacts. The psychological harm caused by AI can sometimes escalate into physical harm, even resulting in death. For example, AI systems can contribute to gender-based violence by enabling harassment, stalking, cyberbullying, and sexual extortion. Another example of harm caused by the use of AI is the generation of "deep fakes" impersonating actual persons to deceive and undermine the decision-making, individual autonomy and free choices of individuals can also be combined with significant harms for groups of persons (for example, sharing the same ethnic or racial origin or gender as the victims depicted on the deep fakes) (European Commission 2025, 30).[XLVIII]

The non-consensual creation of sexual images of women through artificial intelligence is a new form of abuse enabled by technology (for example, sexual deep-fake videos or virtual reality pornography) (Dunn 2020a, 3).[XLIX] Sexual deep-fakes have been created to be used in targeted hate campaigns meant to dox, shame and silence women, or to put their lives in danger (Dunn 2020b, 11).[L] Pornographic deep-fakes contribute to a culture that treats women's bodies as objects for consumption and control (De Silva de Alwis 2023).[LI]

Creating deep-fakes is a highly sensitive action, as it can trigger gender-based violence, these videos/photos create opportunities for new forms of reputational and dignitary abuse (Thomasen and Dunn 2021, 560).[LII] Deep-fake technology has made it much easier to distort reality. It can create fake audio and video of real people, making it look like they said or did things they never actually did (Chesney and Citron 2019).[LIII] This works by using artificial intelligence to analyze a person's face and then place it onto someone else's face in a video (Thomasen and Dunn 2021, 560).[LIV] AI makes it easier to create fake videos and images that look very real, making it harder to tell the difference between real and fake content. While

image manipulation isn't new, especially since tools like Photoshop became popular, AI has made these fakes more advanced and harder to spot (Blauth, Gstrein, and Zwitter 2022, 77115).[LV] It is to be noted that, as of 2019, approximately 96% of all deep-fake videos are pornographic and feature women without their consent (Ajder et al. 2019).[LVI]

In October 2023, a former student from the National Polytechnic Institute in Mexico was charged in one of the first known cases involving AI-facilitated digital violence. The student allegedly used artificial intelligence to create non-consensual deep-fake pornography by digitally removing clothing from images of fellow students, and then profited by distributing and selling these manipulated images online (De Silva de Alwis 2023).[LVII]

Artificial intelligence allows for the rapid and large-scale generation of fake images, audio, text, and video. As a result, perpetrators now have access to sophisticated and automated tools for carrying out sustained harassment campaigns, often requiring little to no technical expertise (Chowdhury 2023, 11).[LVIII]

In addition to deep fakes, artificial intelligence can be used for facial recognition and doxing. For example, many sex workers don't share their real names or contact details with their online content to protect their privacy and stay safe. In 2016, media reported that a group in Russia used a facial recognition app called FindFace to create a database linking images of female escorts and pornographic actors to their social media profiles. After identifying the women, the group shared their sexual content with family members and social media contacts, and publicly posted their names and contact information, encouraging others to harass them (Thomasen and Dunn 2021, 559).[LIX] Artificial intelligence and biometric technologies can accurately authenticate individuals by analyzing their unique physiological and behavioral characteristics (Ward, Spencer, and Kalsi 2023, 4).[LX]

Another form of gender-based violence is online hacking and stalking. Generative AI models can be manipulated to assist in such activities. For example, when asked how to find someone's address online, they may provide detailed information, including which websites can be used (Chowdhury 2023, 19).[LXI]

Disinformation is also a technological challenge. Artificial intelligence contributes to the spread of disinformation in two primary ways: through the generation of false or misleading content and by enhancing the dissemination, amplification, and targeting of such content. The production and circulation of disinformation online can trigger violent acts. When disinformation is created or amplified by AI systems, it can significantly heighten the risk of

gender-based violence, particularly in contexts where it provokes mob aggression or intensifies armed conflict (Ward, Spencer, and Kalsi 2023, 3).[LXII]

The potential positive and negative impacts of artificial intelligence on gender-based violence are extensive, and as the technology continues to evolve, it is likely to give rise to new and unforeseen challenges.

As for the decisions of the European Court of Human Rights concerning gender-based violence involving the use of artificial intelligence, as already noted, there is currently limited case law that directly addresses artificial intelligence not only in the context of gender-based violence, but in general as well. The European Court of Human Rights may not explicitly refer to artificial intelligence in its judgments, but it does establish general principles that in the context of the State's positive obligations, in order to effectively deter serious offences that threaten fundamental values and essential aspects of private life, States must have efficient criminal-law provisions in place (X and Y v. the Netherlands 1985, §§23–24).[LXIII] Accordingly, states must establish an appropriate legislative framework governing artificial intelligence to address and mitigate the adverse consequences associated with its use.

According to the EU Directive on combating violence against women and domestic violence, "states should take measures to prevent the cultivation of harmful gender stereotypes in order to eradicate the idea of the inferiority of women or stereotyped roles of women and men. That could also include measures which aim to ensure that culture, custom, religion, tradition or honour is not perceived as a justification for, or does not give rise to a more lenient treatment of, offences of violence against women or domestic violence" (European Union 2024).[LXIV] The article 8 of this Directive also indicates that intentionally inciting violence or hatred directed against a group of persons or a member of such a group, defined by reference to gender, by publicly disseminating, by means of ICT (information and communication technologies), material containing such incitement should be punishable as a criminal offence.

According to the Recommendation on the Ethics of Artificial Intelligence, states must ensure that the human rights and fundamental freedoms of girls and women, and their safety and integrity are not violated at any stage of the AI system life cycle (UNESCO 2021).[LXV]

Recent regulatory and scholarly literature outlines a range of strategies aimed at addressing and mitigating gender-based violence facilitated or amplified by artificial intelligence. For instance, UNESCO's Red Teaming Playbook offers a ready-to-use

framework for simulating and detecting gendered harms in AI systems (UNESCO 2024).[LXVI] Several scholars thinks that although the AI Act represents meaningful progress in the regulation of high-risk AI systems, it remains limited in its capacity to effectively address gender-based biases embedded in these technologies. It is suggested that, to effectively mitigate the risks and harms associated with AI, the AI Act should incorporate feminist legal principles that emphasize gender equality, accountability, intersectionality, and the structural transformation of embedded biases (Karagianni 2025).[LXVII] Also, promoting diversity and inclusion in AI development teams is proposed as a key measure to counteract gender stereotyping and the potential for AI systems to incite violence. Enhancing women's representation in the field is anticipated to broaden the range of perspectives, stimulate innovation, and raise gender consciousness within teams (Sideri and Gritzalis 2025).[LXVIII] The Council of the EU recommendations prioritize the implementation of appropriate measures to prevent AI systems from producing discriminatory outcomes, including the transparent use of clear, representative, and high-quality data, regular evaluation of AI systems, the incorporation of human oversight along with review and redress mechanisms, and strict compliance with non-discrimination laws and relevant AI sector regulations (Council of the European Union 2025).[LXIX]

5. The potential impact of artificial intelligence on violence against female journalists

The role of a journalist in a democratic society is invaluable. It is particularly important in reporting and exposing human rights violations, informing the public, and promoting and strengthening democracy and the rule of law. It is important to ensure a safe environment and protect the right of media representatives to carry out their journalistic activities freely.

Journalists and other media actors often face specific risks, threats and discrimination based on sex, gender identity, sexual orientation, race, color, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth or other status. Working on certain issues may expose them to threats, attacks, insults and harassment.

Journalists covering protests and demonstrations, as well as women and journalists from various minority groups, are particularly vulnerable. Among them, female journalists face especially high risks, as they are often subjected to gender-based and intersectional discrimination, as well as blackmail and intimidation. Women journalists and other female media actors face specific, gender-related threats in the course of their journalistic work, such as sexism, misogynistic or degrading treatment, threats, intimidation, blackmail, harassment, and sexual violence. These acts are often committed online.

Early studies that examined the gendered nature of the harassment faced by women bloggers in the pre-social media era laid important groundwork for understanding the current landscape of cyber-misogyny. These foundational insights help contextualize the intensified and often targeted abuse experienced by women journalists today within the framework of 'social journalism' (Posetti and Storm 2019).[LXX]

Online abuse is a gender problem. While male journalists also face harassment, female journalists are disproportionately targeted with sexually explicit content as a form of intimidation and gender-based humiliation (Simões, Alcântara, and Carona 2021).[LXXI]

Women journalists and human rights defenders are frequently subjected to online rape and death threats, especially when they engage in discussions on gender equality or challenge traditionally male-dominated fields. According to Global Information Society Watch, women bloggers, journalists, and leaders face online abuse and violent sexual attacks more often than men. Articles written by women tend to attract more abuse and dismissive trolling than those written by men, regardless of the topic (Dunn 2020a, 15, 19).[LXXII] According to ICFJ-UNESCO online violence survey, 25% of women-identifying journalists reported receiving death threats or threats of general physical violence, while 18% said they had experienced threats of sexual violence (OSCE, 2023).[LXXIII]

A prominent example of the global epidemic of online violence against women journalists is Maria Ressa, the Filipino-American journalist and founder of the Manila-based news outlet Rappler. Since the 2016 Philippine election, Ressa has faced daily online abuse, including death and rape threats, doxxing, and racist, sexist, and misogynistic attacks conveyed through text, images, and memes (Posetti et al. 2022).[LXXIV]

The impact of artificial intelligence on female journalists largely mirrors its broader effects in the context of gender-based violence, as it can both reinforce existing risks and introduce new forms of harm specific to their profession and gender.

For instance, it is not only celebrities who are targeted by deep-fakes. For example, Indian journalist Rana Ayyub was the victim of a sexual deep-fake as part of a coordinated online harassment campaign. The abuse she faced was so serious that the United Nations issued a statement urging the Indian government to ensure her protection (UN OHCHR 2018) (Dunn 2020a, 13).[LXXV]

Another defining feature of online abuse targeting women media professionals is the deliberate use of disinformation. False claims are circulated to damage their reputation, discredit their work, and silence their public voice. These tactics often involve deploying bots to spread carefully crafted lies and propaganda at a large scale, creating the illusion of widespread, grassroots opposition (Posetti and Storm 2019).[LXXVI] According to ICFJ-UNESCO online survey, 41% of female journalists reported that the online violence they experience is associated with coordinated disinformation attacks (OSCE, 2023).[LXXVII]

One of the most important decisions on cyber-violence against woman journalist was delivered by the European Court of Human Rights in the case of Khadija Ismayilova v. Azerbaijan (Khadija Ismayilova v. Azerbaijan 2019).[LXXVIII] The case concerned the state's failure to protect applicant from unjustified intrusions into her private life linked to her work as a journalist. According to the factual circumstances of the case, applicant was a female journalist who investigated and broadcasted critical of the government, including corruption and violations of human rights in Azerbaijan. The applicant stated that ever since she started reporting critically on the government, she has faced threats and various forms of intimidation. The applicant received a letter containing still images taken from a video that showed her engaged in sexual intercourse, along with the accompanying message: "Whore, refrain from what you are doing, otherwise you will be shamed!". The threat was related to her journalistic work to cease her activities. A few days later, the intimate videos were published and disseminated online. The State failed to fulfill its positive obligation to conduct an effective investigation.

According to the court, the actions taken against the applicant violated human dignity, namely the intrusion into the applicant's home and the installation of hidden video surveillance cameras, secretly filming during the most intimate moments of her life, in the privacy of her own home, and later publicly sharing those videos. Also, receiving a letter threatening her with public humiliation. The applicant is a well-known journalist and there was a plausible link between her professional activity and the aforementioned intrusions,

whose purpose was to silence her. In this case, the European Court of Human Rights found that the State had failed to fulfil its positive obligation to conduct an effective investigation into the alleged acts against the applicant, in breach of Article 8 of the European Convention on Human Rights. The Court also found that the State had failed to ensure the protection of the applicant's right to carry out her journalistic activities and to exercise her freedom of expression, therefore state has violated the Article 10 (Freedom of expression) of the Convention.

Automated online attacks, carried out through bots or other forms of artificial amplification, intensifies the consequences of online harassment experienced by women working in the media. This escalation not only affects journalists themselves but also extends harm to their predominantly female audiences and sources (Posetti and Storm 2019).[LXXIX]

6. Conclusion

The rise of information and communication technologies has played a major role in speeding up globalization, making it easier for people to connect, share information, and trade across borders. While this digital transformation has brought many benefits, it has also introduced new risks. One of the most concerning is the growing issue of cyber violence against women and girls. This type of abuse takes many forms and is deeply rooted in long-standing patriarchal and misogynistic social structures, now amplified in the digital space. Violence against women in the digital realm is a growing global problem with severe consequences.

There's a worrying rise in the use of AI-powered chat-bots and online forums where abusers exchange tips and techniques to harm virtual partners. At the same time, the spread of AI-generated images, videos, and other digital content targeting women is creating a new and dangerous form of violence. With facial mapping and AI technology, images and videos can be manipulated to create hyper-realistic deep-fakes. When used to produce pornographic content, these deep-fakes contribute to a culture that treats women's bodies as objects and fuels further harm. Today, pornographic deep-fakes have become yet another tool for gender-based violence and tech-enabled abuse against women.

To develop effective protective measures for women, it is essential to fully understand the risks associated with the use and abuse of AI systems. To effectively address this issue, it is essential for states to establish a comprehensive legislative framework. Such legislation should govern the implementation of the principles of equality and non-discrimination in the integration of artificial intelligence, as well as its potential misuse as a weapon by private individuals.

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Acronyms and Abbreviations
AI - Artificial Intelligence
CEDAW - Convention on the Elimination of All Forms of Discrimination against Women
DNA - Deoxyribonucleic acid
ECHR – European Court of Human Rights
EU – European Union
GREVIO - Group of Experts on Action against Violence against Women and Domestic Violence
OECD - Organisation for Economic Co-operation and Development

OSCE - Office of the Organization for Security and Co-operation in Europe
UNESCO - United Nations Educational, Scientific and Cultural Organization
UN - United Nations
UN OHCHR - United Nations Office of the High Commissioner for Human Rights

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