

1. Submission Form

Public Consultation on the Development of the Priorities and Policy Programme for Ireland's Presidency of the Council of the European Union 2026

Mandatory questions	
Name	Sarah Benson
Organisation (if any)	Women's Aid
Date of submission	11/12/2025
Do you agree to all of the terms set out in this consultation process, including those set out under section 5 and 6?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

Optional questions	
<i>The following questions are asked only to help us understand the range of perspectives received as part of this consultation process.</i>	
Respondent type (i.e., individual, NGO, business, academic, local authority, etc.)	NGO
What is your sector/area of work?	Domestic violence and abuse/ violence against women.
What is your connection to the issues you are providing feedback on? For example, are you an expert practitioner, person affected by a policy issue, member of the public with a general interest in the topics, etc.?	Women's Aid is a national, feminist organisation working to prevent and address the impact of domestic violence and abuse, including coercive control, in Ireland since 1974. The online dimension of DVA/VAW has become an important part of our day-to-day and advocacy work.
Describe your geographical focus in the context of your submission? For example, rural, urban, national or EU wide.	<p>Women's Aid provides the National Freephone Helpline as well as direct face-to-face services in the greater Dublin region.</p> <p>Our extensive training, awareness raising and policy work has mostly a national focus; However, there is also an international and particularly European dimension to it, especially regarding advocacy on relevant EU legislation and initiatives.</p>

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Through these consultations the Government is seeking to gather observations, suggestions, and reflections on how Ireland can best fulfil its Presidency role; ensure the Presidency policy programme is informed by diverse perspectives from across Irish society; and identify EU-wide issues, themes, and policy areas that should be given particular attention during Ireland's Presidency.

It is proposed that Ireland's overall policy approach for the 2026 Presidency will be expressed at a high level in the form of a single overarching phrase or slogan setting out a people-centred and future-oriented vision for the EU, accompanied by three priority themes.

Respondents are asked to consider the following guiding questions and to limit their responses to each question to a maximum of 500 words. Please note that you do not have to respond to all questions.

Respondents are welcome to submit additional information alongside Submission Form. However, in such cases, respondents must provide a summary of the additional information under the 'Any other comments' question. This response should also be limited to a maximum of 500 words.

Question 1 – What should Ireland choose as the high-level thematic priorities for its Presidency of the Council in 2026?

Please limit response to a maximum of 500 words.

Women's Aid recommends that one of the high-level thematic priorities for Ireland's Presidency of the EU Council be **Comprehensively Combating Cyber-Violence Against Women (CVAW) in all its forms**.

Violence against women is prevalent in the EU and Cyber VAW comprises the many forms this violence takes in the digital world. These include cyber harassment, cyber stalking, non-consensual sharing of intimate material (including deep fakes) and hate speech/misogynistic content, among others. CVAW is part of the continuum of violence that women and girls experience for reasons related to their gender offline, and it is equally harmful. In fact, the harm of cyber violence is multiplied because by its nature it is easily amplifiable, persistent, and in many cases, permanent. These forms of abuse frequently overlap with offline forms of abuse, especially in domestic abuse cases and sexual violence.

EIGE estimates that one in ten women have experienced a form of cyber violence since the age of 15ⁱ. While cyber violence can affect anybody, women and girls are disproportionately affected, in particular young women, women subjected to intersecting forms of discrimination and women in the public sphere (journalists, politicians, activists).ⁱⁱ

CVAW seems to be increasing, with new technologies providing new tools of abuse, in particular the EWL report warns against artificial intelligence, virtual reality and online gaming as increasingly threatening forms of CVAW.

The huge harmful impact of the manosphere and of pornographyⁱⁱⁱ, -including the normalisation of strangulation and of violent pornography which would be illegal offline but

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can be legally hosted online^{iv} - are also of great concern.

The European Union has taken measures against CVAW, in particular specific Articles of the Directive 2024/1385 on combating violence against women and domestic violence (Articles 5 to 8) and the Digital Services Act. However, gaps remain in terms of legislation, enforcement, harmonisation and data collection^v. Notably, the Artificial Intelligence Act does not contain any express reference to CVAW.

Notwithstanding the above efforts, cyber violence against women and girls continues, and the response of social media and online platforms is clearly not good enough^{vi}.

We note that the Commission programme for 2026 includes a commitment to “ensure that the online environment is safe, fair and empowering so that people can make the most of technology^{vii}” and we recommend a strong gender analysis is used in its implementation to counteract the prevalence and harmful impact of cyber violence on women and girls.

Our recommendation also builds on the current Danish presidency work-plan goals to make online service providers more accountable for content on their platforms^{viii}, combat sexual exploitation of children online^{ix}, combating violence against women including exposure of men and boys to unrealistic ideals of masculinity and misogynistic content online^x and protecting children and young people online^{xi}.

Given the presence of many digital multinational platforms in Ireland, the Irish EU presidency presents a great opportunity to lead on the response to cyber violence against women and girls.

Question 2 – Which particular policy areas and legislative proposals should be a focus of work for the Irish Presidency of the Council in 2026? What should the Irish Presidency aim to achieve in these areas?

Please limit response to a maximum of 500 words.

The overall aim of legislative and policy measures should be a significant strengthening of online safety for women and girls, with an intersectional lens. This would include prevention and awareness raising measures, improved legislation and enforcement, stronger duties on platforms to limit and rapidly respond to CVAW, support for victims and research and data collection.

There is a need to:

- Improve the VAW Directive, extend it to forms of CVAW currently not covered and monitor its transposition.
- Address online misogyny, which is the most common form of online hate^{xii}.
- Strengthen the regulation of AI in relation to how it is used to commit and amplify CVAW.
- Address the harms of new forms of online CVAW, such as violence in the metaverse

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and online gaming.

- Enhance the mechanisms for fast removal of CVAW from platforms and social media.
- Improve enforcement of DSA and monitor its efficiency in combating CVAW.
- Improve research and harmonise data collection and collaboration.
- Improve protection of minors.

The harms of pornography (to children and adults) should also be addressed, with measures like criminalisation of violent pornography that depicts rape, incest, or strangulation/suffocation (as in recent UK legislation) - ensuring parity between online and offline regulation of abusive behaviours, whereby; what is illegal offline cannot be legally created or disseminated online.

Artificial Intelligence and other use of 'deepfake' production also needs to be addressed whereby innocent parties' images and voices are being grossly misused to create fake videos, images and speech that can cause serious harm and distress. Individuals are entitled to protection of their image and voice from such increasingly prevalent online abuses.

Women's Aid is agnostic as to which piece of legislation or policy initiative should be used in this respect, but the following items in the Commission workplan could be useful opportunities:

- Action plan against cyberbullying.
- Gender Equality Strategy 2026-2030.
- Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND THE COUNCIL on combating the sexual abuse and sexual exploitation of children and child sexual abuse material and replacing Council Framework Decision 2004/68/JHA (recast).
- Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL laying down rules to prevent and combat child sexual abuse.
- Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Directive 2012/29/EU establishing minimum standards on the rights, support and protection of victims of crime, and replacing Council Framework Decision 2001/220/JHA.
- A more inclusive and protective Europe: extending the list of EU crimes to hate speech and hate crime (to extend hate crimes to those based on gender).

Women's Aid endorses the recommendations to the EU in the EWL report^{xiii} and in the Strasbourg call to combat cyber violence against women and girls and look forward to the

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Irish presidency providing a strong lead in this vital matter.

See <https://stopsexualexploitationonline.eu/wp-content/uploads/2025/10/STRASBOURG-CALL-1.pdf>

Question 3 – How can the work of the Council during the term of the Irish Presidency make the most substantial positive impact for people, businesses, and communities across the EU?

Please limit response to a maximum of 500 words.

Given the huge impact of cyber violence against women and girls in terms of prevalence, persistence and harm Women's Aid believes that addressing this issue would have a huge positive impact on people and communities in the EU, including men and boys.

It would also have a positive impact on democracy as research proves that women politicians, journalists, and activists are greatly impacted and silenced by CVAW^{xiv}.

Question 4 – How can we best communicate the values and benefits of EU membership to its citizens and create a sense of ownership, amongst citizens, over Ireland's Presidency of the Council of the EU?

Please limit response to a maximum of 500 words.

Question 5 – Any other comments

Respondents are welcome to submit additional information alongside Submission Form. However, in such cases, respondents must provide a summary of the additional information under the 'Any other comments' question. This summary should also be limited to a maximum of 500 words.

i EIGE (2022), Combating cyber violence against women and girls.

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- ii European Women's Lobby (2024), Report on cyber-violence against women, <https://womenlobby.org/new-publication-report-on-cyber-violence-against-women/>
 - iii ibidem
 - iv Dublin RCC, HARMFUL ONLINE INFLUENCES: THE IMPACT ON WOMEN & GIRLS
 - v For further details see EWL report and Strasbourg call, Fighting Cyber violence against women and girls in the EU, [fohttps://womenlobby.org/wp-content/uploads/2025/09/Strasbourg-Call-EN.pdf](https://womenlobby.org/wp-content/uploads/2025/09/Strasbourg-Call-EN.pdf)
 - vi European Women's Lobby (2024), Report on cyber-violence against women, <https://womenlobby.org/new-publication-report-on-cyber-violence-against-women/>
 - vii https://eur-lex.europa.eu/resource.html?uri=cellar:7f0c63c8-ae8f-11f0-89c6-01aa75ed71a1.0001.02/DOC_1&format=PDF, page 7
 - viii Programme of the Danish EU presidency 2025, <https://danish-presidency.consilium.europa.eu/media/xv5jn5nx/programme-of-the-danish-eu-presidency-2025.pdf>, page 24
 - ix Ibidem, page 24
 - x Ibidem, page 30
 - xi Ibidem, page 36
 - xii European Women's Lobby (2024), page 36
 - xiii Ibidem, pages 87-88
 - xiv See <https://www.womensaid.ie/app/uploads/2023/09/Womens-Aid-Submission-to-the-Task-Force-on-safe-participation-in-political-life-August-2023.pdf>