Submission to the European Commission and the Board of the Digital Services Coordinators on the Article 35(2) DSA report on systemic risks and their mitigation, 2026 edition

Introduction

Women's Aid is a national, feminist organisation working to prevent and address the impact of domestic violence and abuse (henceforth DVA) including coercive control, in Ireland since 1974. We do this by advocating, influencing, training, and campaigning for effective responses to reduce the scale and impact of DVA on women and children in Ireland and providing high quality, specialised, integrated, support services.

The online dimension of DVA/VAW has become an important part of our day-to-day and advocacy work. The survivors we work with regularly tell us they are monitored and stalked on line and that their partners and ex-partners use online platforms to harass and discredit them. Women are particularity concerned about threats of and actual sharing of intimate images without consent, including deepfakes.

We have contributed submissions to the Online Safety and Media Regulations Act and the Online Safety code for Video Sharing Platforms, and provided feedback to school curricula addressing gender based violence including online abuse and we include information and resources on online safety in our dedicated prevention website www.toointoyou for young women. More information on Women's Aid is available on our website womensaid.ie.

As an organisation working to end domestic abuse and violence against women, Women's Aid is extremely concerned at the ongoing and increasing abuse of women and girls on online platforms and is pleased to have the opportunity to provide this contribution to the 2nd edition of the DSA report on systemic risks and their mitigation.

QUESTION 1

5 Wilton Place, Dublin 2, Ireland
Tel: 01-6788858
Email: info@womensaid.ie

24hr National Freephone
Helpline **1800 341 900**
Registered Charity No. 20012045

womensaid.ie

A. Please provide any information that is suitable for identifying and assessing systemic risks you find potentially prominent or recurrent. The submission can consist e.g. of studies (conducted by yourself or third parties), lists of typical risks occurring through the use of the services and relevant findings or conclusions in regards of (typical) practical experiences made by users you represent or are aware of. Where possible, please describe the context in which the risks occur (e.g., specific functionalities, use cases, or user groups).

B. Do you see any other potential systemic risk that you believe may be overlooked and that should be identified, analysed and assessed?

C. Where available, please include information about what makes each risk prominent or recurrent. This may include elements such as its scale, frequency, cross-border nature, or impact on specific vulnerable groups.

D. Please specify whether the information you provide relates to a single Member State, to several Member States or whether it applies to the entire Union. Information on how risks manifest outside of the Union are of out the scope of the DSA and thus not relevant to this exercise.

E. Please refer to any existing documentation, research or resources that could help substantiate the evidence you provide. If the material is publicly available, please provide links or references.

Given Women's Aid remit, we will focus this submission on the systemic and recurrent risks posed by VLOPs and VLOSEs in relation to Intimate Partner violence and Violence against women more generally.

Cyber Violence against women is part of the continuum of violence that women and girls experience offline for reasons related to their gender, 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. Very large Online platforms and Search engines present a number of systemic risks for women, girls and

5 Wilton Place, Dublin 2, Ireland
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children, which are unfortunately persistent and recurrent and have not been addressed adequately. These risks include both illegal content, and content which, while not necessarily or always illegal, impinges on women, girls and children's fundamental rights and on women's participation in civic life.

In relation to intimate partner online abuse, Women's Aid hears regular reports of how platforms allow partners and ex-partners to control and abuse women by:

- monitoring, stalking and harassing them online on a variety of platforms
- sharing (or threatening to) intimate images without consent
- sharing women's details on escort sites without their consent or knowledge
- spreading lies and misinformation about them online to destroy their professional and social life

Looking more generally at Violence against women and children, systemic risks include VLOPs being used for the following:

- child sexual abuse, including production and distribution of CSAM, grooming leading to online and/or offline sexual exploitation and sexual extortion. For example:
    - In 2024, Hotline.ie processed 44,955 reports of child sexual abuse material (CSAM), representing a substantial 55% increase on 2023.[1]
    - During 2025, An Garda Síochána identified and safeguarded 151 children, 16 of whom were located in Ireland[2].
    - Child grooming: the GroSafe research found that in a gaming environment it can take 45 minutes for a grooming situation to develop, but can be as little as 19 seconds[3].

1 Hotline.ie 2024 Annual Report, https://hotline.ie/wp-content/uploads/2025/06/Hotline-ie-Annual-Report-2024.pdf
2 https://www.irishexaminer.com/news/courtandcrime/arid-41784767.html
3 Fiona Jennings, ISPCC, Opening Statement to the Joint Oireachtas Committee on Children and Equality 9-01-2026,

5 Wilton Place, Dublin 2, Ireland
Tel: 01-6788858
Email: info@womensaid.ie

- Children viewing and being led by recommender systems to harmful material, including pornography and misogynistic content, which has been demonstrated to have a negative impact on their (future) relationships, on sexualisation of girls and on gender equality. [4]

  In this regards, Women's Aid research found that pornography, including violent pornography which would be illegal offline, is easily accessible by both adults and children and confirmed its negative impacts and links with violence against women[5].

- Non consensual sharing of intimate images, including AI generated images (e.g. nudification apps), which predominantly impacts on women, girls and children.

  Non consensual intimate images are shared on video sharing platforms, social media, forums, but also on pornography websites, with platforms never checking if they are shared with or without consent of the persons depicted. Platforms also allow the posting of videos of victims of trafficking or sexual abuse, sometimes with identifying information, and the non- consensual posting of women's details and images on pornography and escort websites.

  Once an intimate image is uploaded, it can go viral and be shared multiple times across different platforms. It then becomes nearly impossible to delete all occurrences, and even if the image is deleted from the original site, it can reappear on others endlessly, which is extremely harmful to the victims.

  - In Ireland Hotline.ie received 519 reports of Intimate image abuse in 2024 (including threats to share); of the images that were actually shared 92% involved public accessible content and 51% were shared in a social network platforms.[6]

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https://data.oireachtas.ie/ie/oireachtas/committee/dail/34/joint_committee_on_children_and_equality/submissions/2026/2026-01-29_opening-statement-fiona-jennings-head-of-policy-and-public-affairs-irish-society-for-the-prevention-of-cruelty-to-children-ispcc_en.pdf

4 See for example, Online Health Taskforce, 2025, Online health and rights for Ireland's children and young people, page 24. https://assets.gov.ie/static/documents/b192b694/Online_Health_Taskforce_Report_Final_Sept_2025.pdf

5 https://www.womensaid.ie/app/uploads/2024/10/Facing-Reality-Full-Report-October-2024.pdf

6 Hotline.ie 2024 Annual Report page 29

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- The recent Grok scandal unfortunately shows there is a huge interest in applications whose sole function is to degrade and humiliate women and children, with an estimate 3 million images generated world wide[7]. It is also clear that platforms are unwilling to prevent the creation and sharing of non-consensual intimate images and that current regulatory systems are too slow and totally inadequate to stop them.

- Platforms being used to harass, track, stalk women, and to discredit women activists, politicians and journalist, including through the use of deepfakes, hindering women's participation in public life[8].

  The recent case of Gráinne Seoige[9] in Ireland shows how difficult it is to stop deepfakes being shared, even with police's involvement. It also evidences the significant impact this has on women's dignity as well as the chilling effects on women's willingness to participate in civic discourse and democratic process. In this case, when standing for elections in 2024, a woman candidate was a victim of deepfake sexual images, which were shared on Whatsapp. Complaints to Meta brought no results, and current legislation was shown to be ineffective, ultimately discouraging women to run for office.

- Platforms being used to incite hatred against women and minorities, to promote discrimination, misogyny and justify or glorify violence against women, infringing on women's right to dignity.

  A recent European Women Lobby on Cyber-violence against women, quoting a Fundamental Rights Agency study, states that "**misogyny is the most prevalent** form of online hate across all the examined platforms" and that there are higher level of incitement to violence against women, compared to other groups, including high rates of sexualised violence[10]. The same report notes that platforms responses are ineffective.

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7 https://irishtechnews.ie/global-response-to-nudification-apps-following-grok-scandal/

8 https://www.womensaid.ie/app/uploads/2023/09/Womens-Aid-Submission-to-the-Task-Force-on-safe-participation-in-political-life-August-2023.pdf

9 https://www.oireachtas.ie/en/debates/debate/joint_committee_on_arts_media_communications_culture_and_sport/2026-01-21/2/

10 European Women's Lobby (2024), Report on cyber-violence against women, page 36; https://womenlobby.org/new-publication-report-on-cyber-violence-against-women/

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Women's Aid believes that VLOPs and VLOSEs are not doing enough to assess and mitigate the risks mentioned above and therefore such online spaces are often not safe for women and children. We also note that a recent Ombudsman for Children's Office Survey found that 73% of young people believe social media companies need to be far more proactive in managing risks with 63% encountering extremist views on line, compared to only 6% in offline settings[11].

QUESTION 2

A. Please provide any information on the influence of these, or any other, risk factors on the systemic risks you have identified.

B. Please specify the risk factors and the systemic risks concerned and refer to any existing documentation, research or resources that could help substantiate the information you provide.

Women's Aid would like to highlight the following risk factors, which platforms are not safeguarding against:

Recommender systems

Recommender systems often drive users, (especially young ones), towards harmful content. In particular misogynistic and violent content is often promoted to young boys and men, with no adequate platform intervention to prevent this.

For example, a 2024 study found that recommender systems play a role in promoting extremist and misogynist content to boys on social media. The study found that all

11 https://data.oireachtas.ie/ie/oireachtas/committee/dail/34/joint_committee_on_children_and_equality/submissions/2026/2026-01-29_opening-statement-timmy-hammersley-head-of-participation-and-rights-education-ombudsman-for-children-s-office_en.pdf

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its experimental accounts -both those which sought out manosphere content and those which sought out gender-normative (generic) content - were fed toxic content within the first 23 minutes of the experiment, and manosphere content within the first 26 minutes. Once an account showed interest by watching manosphere content, the amount rapidly snowballed[12].

AI generated content, including nudifying apps

The presence on platforms of nudifying apps presents the obvious risk that they will be used for the production of CSAM and of non -consensual intimate images and to denigrate and humiliate women and children, as has been clearly demonstrated with Grok. Grok however is only one of many such apps, which are easily available online. Search engines such as Google allow users to search and find nudifying and deepfake porn apps in seconds[13].

It does not appear that any risk assessment on how these apps would be used has been undertaken by relevant VLOPs and VLOSEs. These apps do not have any legitimate use, and should be banned.

AI "girlfriends" are also concerning, in that they are often hypersexualised versions of girls and women, promoting rape myths and gendered violence, again without any forms of risk assessment on how this may impact on real life relationships and gender equality being carried out.[14]

Lack of any checks on consent before intimate images are uploaded

Platforms do not have any checks in place to ensure that intimate images which are uploaded are being shared with the consent of the people depicted in them, which obviously increases the risk of intimate image abuse. Moreover, in many cases these harmful images can be uploaded in such a away that the user cannot be identified.

12 Dr Catherine Baker, Prof Debbie Ging and Dr Maja Brandt Andreasen DCU Anti-Bullying Centre Dublin City University April 2024, Recommending Toxicity: The role of algorithmic recommender functions on YouTube Shorts and TikTok in promoting male supremacist influencers, https://antibullyingcentre.ie/recommending-toxicity/

13 EWL Report 2024, op.cit. page 78

14 https://www.irishexaminer.com/lifestyle/healthandwellbeing/arid-41675852.html

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Given how widespread intimate image abuse is and how severe its impact, this is a huge risk, which is not being considered or mitigated. Platforms should have to be made accountable for ensuring that intimate images (whether real or AI generated) are only uploaded with the consent of the persons depicted, and that the user uploading them can be identified.

Lack of Platforms response and monitoring

In our experience platforms do not respond promptly to request to take down material, including non consensual intimate images, as exemplified by the Gráinne Seoige story mentioned above.

Sexist and violent misogynist content, such as that promoted by the "manosphere" is not checked or blocked or even warned against, on the opposite it is often promoted by recommender systems both to adults and minors.

In short, there does not seem to be any risk assessment nor accountability of platforms for the content they host and promote.

QUESTION 3

A. Please provide examples of mitigation measures addressing any systemic risks you have identified, specifying where possible to which systemic risks such measures relate.

B. When providing those examples of mitigation measures, please, to the extent possible, link them to the specific types of providers they relate to (e.g. social media, online marketplaces, application stores, pornographic platforms, search engines).

C. When providing those examples of mitigation measures, please make sure to distinguish whether you are describing measures currently being used in practice by providers or whether you/other stakeholders are proposing them.

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D. Please refer to any existing documentation, research or resources that could help substantiate the information on the risk mitigation practices you refer to. If the material is publicly available, please provide links or references.

Women's Aid believes that the current regulations for VLOPs and VLOSEs do not work and much more needs to be done to identify and address systemic risks online and especially to upheld the safety and dignity of women and children. We recommend the following mitigation measures:

1) Recommender system should be switched off by default for adults and banned for children, as proposed for example in the Online Safety (Recommender Algorithms) Bill 2026[15] in Ireland.

2) VLOPs should be made to require user verification before the uploading of intimate images (including deepfakes) and should verify the consent of all people depicted as recommended in the the EVAW Violence against Women and Girls Code of Practice. This means that anonymous accounts should not be able to upload or share this type of content and that users will have to confirm they are sharing with consent. This should be accompanied with messaging that informs them it is a criminal offence to upload material without the consent of those depicted, including content in violation of copyright and that the platform will take action against users for doing this. This should apply both to VLOPs whose principal purpose is to provide access to pornography and to VLOPs where this is not the principal purpose.[16]

We do however also note, and emphasize, that where a woman or young person is subject to coercion and exploitation that consent may 'appear to be given' in uploading of content, but that it can be revealed that they were coerced to do so. Therefore, it is vital that platforms recognize this and respond swiftly, and without question, to any subsequent complaint and take down request regardless of whether there was any initial indication of 'consent'.

15 https://www.oireachtas.ie/en/bills/bill/2026/7/

16 See EVAW Violence Against Women and Girls (VAWG) Code of Practice, https://www.endviolenceagainstwomen.org.uk/wp-content/uploads/2022/05/VAWG-Code-of-Practice-16.05.22-Final.pdf

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3) Nudification apps should be banned from VLOPs as there is no legitimate use for them. VLOSEs should not allow users to find them. We note that Jeremy Godfrey, Executive Chairperson at Coimisiún na Meán in its Opening Statement of 24th February 2026 to the Joint Committee on Artificial Intelligence mentions such a possibility, which we would support: "*For instance, it could be useful to make it a prohibited practice to deploy AI systems that are capable of producing intimate imagery of real people without their consent, or which are capable of producing child sex abuse material.*[17]"

4) Another mitigation measure would be the copyrighting of one's body, facial features and full voice to clamp down on the creation and dissemination of deepfakes, as proposed in Denmark. This would provide protection against sexualised deepfakes and also against identity theft more generally.[18]

5) Platforms Terms and Conditions should always include prohibition of uploading intimate images without consent, and misogynistic / Violence Against Women promoting content

6) Platforms should provide fast responses to reports and flagging, and **immediately** take down intimate images without consent material (including from social media platforms), pending a more detailed examination of the material legitimacy as time is of the essence to prevent this material going viral; national and/ or EU authorities should be able to issue and enforce take down orders in this respect.

17 https://data.oireachtas.ie/ie/oireachtas/committee/dail/34/joint_committee_on_artificial_intelligence/submissions/2026/2026-02-24_opening-statement-jeremy-godfrey-executive-chairperson-coimisiun-na-mean_en.pdf

18 https://cybernews.com/denmark-deepfake-cybercrime-eu/ https://www.myprivacy.blog/denmark-makes-history-your-face-and-voice-are-now-your-intellectual-property/

5 Wilton Place, Dublin 2, Ireland
Tel: 01-6788858
Email: info@womensaid.ie

7) Platforms should be required to collaborate with each other in relation to the same harmful content being uploaded on multiple platforms to minimise distress for users and victims of abuse.

8) Content moderation should be supervised by humans and not rely solely on AI. Moderators need to be trained on the various forms of online violence against women and supported in dealing with what is often harrowing and disturbing content. They also need to be culturally competent for the local areas they monitor. They need to also be trained in diversity and inclusion.

QUESTION 4

Do you have any other information and/or material relating to the Digital Services Act that you would like to share with the European Board of Digital Services and the Commission? If so, please use the reply to this question to convey it.

This may include, but is not limited to:

- *Additional evidence, such as case studies illustrating concrete manifestations of systemic risks;*
- *Evidence regarding the effectiveness or limitations of mitigation measures adopted by providers of VLOPs and VLOSEs;*
- *Information on cross-border impacts or spillover effect;*
- *Observations on emerging or evolving systemic risk trends not covered in this set of questions;*
- *Any other information or material relating to the DSA, including any information beyond the topic of systemic risks, but that could still be relevant to the report, that you would like to share with the Board and the Commission*

Conclusions

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Women's Aid

Women's Aid believes that current regulations are not working to protect women and children from systemic risks online and that it is necessary to make platforms much more accountable for the content they publish than they currently are.

Women's Aid are grateful for the opportunity to submit on this very important piece of work and are available to discuss any aspect of our submission on request.

Sarah Benson

CEO

Women's Aid

Ireland

sarah.benson@womensaid.ie

+353 (0) 1 6788858

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Tel: 01-6788858
Email: info@womensaid.ie

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