

Achieving Real Freedom from Gender-Based Violence: The Opportunity for a Transformative EU Prevention in the EU Gender Equality Strategy post 2025

The Women Against Violence Europe (WAVE) Network welcomes the European Commission's consultation on the next EU Gender Equality Strategy post-2025 and offers this submission to ensure that the principles outlined in the Roadmap for Women's Rights translate into transformative, lasting change for women and girls across Europe.

WAVE has identified critical gaps in current EU approaches and sets out comprehensive recommendations based on evidence, the expertise of our 186 members, representing circa 1600 women's organisations, and the lived experiences of women and girls accessing these specialist services. The document underscores the need to move beyond fragmented responses towards a holistic and systemic framework for preventing and combating violence against women and girls (VAWG).

How a comprehensive, three-pronged approach to prevention can end violence against women and girls

The current EU Roadmap for Women's Rights, under principle one, freedom from gender-based violence, rightly emphasises the key role of prevention. WAVE urges the European Commission to strengthen its approach so that this principle leads to real, effective action to ensure freedom from gender-based violence in Europe.

At present, EU policies and programmes tend to focus disproportionately on: (1) interventions that occur <u>after</u> VAWG has already begun or been identified¹; (2) initiatives that target public attitudes towards VAWG and women's rights but do not directly seek to change behaviour or tackle the underlying structural root causes of violence; and (3), an over reliance on institutions and civil society organisations as the principal actors, rather than empowering citizens themselves to prevent violence through their own actions. As a result, too often, scarce resources are invested in tools and strategies that are insufficient to truly prevent violence against women and girls (VAWG).

Such perspective hinders the development and implementation of truly effective, lifecourse prevention measures that can reduce the prevalence and incidence of VAWG. To translate the roadmap's principle one into practice, a shift is needed toward a

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¹ We make a distinction between the prevention of forms of violence against women that occur over long periods, such as domestic violence or gender discrimination, and those that are limited in time, such as rape. There is a need for precise terminology to describe prevention measures that seek to identify and disrupt violence in its early stages, especially for forms that unfold over time, rather than only intervening after violence has occurred.



comprehensive, evidence-based, and community-driven approach to prevention, focusing on addressing violence before it occurs and empowering everyone in society to be part of the solution.

Prevention is inherently a multi-layered framework reflecting the World Health Organisation's ecological model of interpersonal violence, which recognises that violence is the result of complex interactions among factors at the individual, relationship, community, and societal levels—and that the interplay between these levels is as important as the factors themselves². No single factor or intervention is sufficient to explain or prevent violence; rather, a coordinated approach is needed across all these layers.

Given this complexity, **effective prevention of VAWG requires a comprehensive and integrated strategy that operates on multiple fronts at the same time**. This means taking coordinated action on <u>primary prevention</u>, which aims to stop violence before it occurs by reducing risk factors and vulnerability; <u>secondary prevention</u>, which focuses on early identification of violence, prompt intervention to prevent escalation, and timely support for victims and survivors; and <u>tertiary prevention</u>, which manages the consequences of violence, supports recovery, and works to prevent reoffending and revictimization. Each of these is a crucial prong of an effective strategy—just as a fork cannot function if even one prong is missing, EU efforts to prevent VAWG will be incomplete unless all three types of prevention are addressed together.

However, the EU's current approach to preventing VAWG remains fragmented and lacks a thorough understanding of what effective prevention requires, including the need for coordinated action across all three pillars. As a result, it does not adequately reduce women's and girls' risk of exposure to violence, abuse, and exploitation, risks that stem from structural inequalities such as economic disparity, discrimination in education, healthcare, and limited access to social services³. An overreliance on awareness-raising campaigns has also failed to confront the patriarchal norms, values, and behaviours that normalise misogyny, gender inequality, and disregard for women's and girls' rights.

Dangerous Shortcuts: Why Limited Interventions Undermine VAWG Prevention

Awareness-raising campaigns (ARCs) are often considered the default tool for preventing VAWG. However, decades of evidence–including a 2002 WHO study–show that ARCs alone are not effective at reducing violence rates, including VAWG. While well-designed campaigns can help shift attitudes, they rarely succeed in changing behaviour, largely because they do not foster the

²World Health Organization. *Violence Prevention Alliance: The Public Health Approach*. Available at: https://www.who.int/groups/violence-prevention-alliance/approach (accessed 26 June 2025).

³ Including by not sufficiently challenging the heteronormative, male-centered, able-bodied policies of urban planning, housing, mobility, care, parental leave, access to work, among others.



social skills needed for prosocial action. Most ARCs focus on informing the public about different forms of VAWG and their consequences yet often fail to address the root causes of violence—an essential step for real and lasting change.

Similarly, there is an over-reliance on **short-term perpetrator programmes**, particularly those created as brief, standardised interventions linked to sentence or penalty reductions for VAWG or domestic violence. These one- to three-month certifications are not only insufficient for supporting genuine behavioural change, but—when used as a ticket to early release or a reduction in sentencing—may be actively harmful. Perpetrators may exit these programmes before any meaningful transformation takes place, creating a risk of reoffending. Worse, the presence of a certificate can be weaponised: perpetrators may use it to claim they are "reformed" even in cases of continuing violence, thus making it harder for victims to be believed and protected (including children in child custody proceedings).

Together, these examples illustrate a fundamental misunderstanding of prevention. Relying on superficial interventions—ARCs or short perpetrator programs—fails to distinguish between symbolic action and true prevention, potentially putting victims at greater risk and allowing cycles of violence to continue unchallenged. Robust primary prevention—rooted in lasting behavioural and structural change—remains essential.

To dismantle this status quo, the next EU Gender Equality Strategy must place violence against women prevention as its cornerstone, and for that, a radical shift in perspective is essential: we must envision and actively construct a reality where VAWG is neither acceptable nor inevitable. Women and girls in the EU will benefit greatly if the Strategy adopts a comprehensive approach to VAWG prevention that acts across all pillars—primary, secondary, and tertiary.

Up until now, most promoted efforts have concentrated on secondary and tertiary prevention—mainly sharing information and, in some cases, attempting to shift attitudes—while primary prevention is all but neglected. Furthermore, current policies tend to regard state institutions and civil society organisations as the primary actors in prevention, viewing citizens merely as targets or beneficiaries of these measures, rather than as active participants. Yet it is citizens who are present at the moment and place where VAWG occurs, as potential victims, perpetrators, or bystanders, while institutions and CSOs can only intervene from a distance. **This means that the enormous potential for social change through citizen participation remains largely untapped**. EU efforts to prevent VAWG will be incomplete unless all three types of prevention are addressed together.

To illustrate how each prong contributes to an effective, comprehensive strategy, the following provides examples of measures at each level.



- **Primary prevention** measures aim to prevent violence from occurring and reducing vulnerability to VAWG. Effective tools include:
 - o For women and girls, feminist self-defense and gender-sensitive urban planning, both of which increase women's safety and agency.
 - o For men and boys, programmes that promote unlearning entitlement and becoming active bystander allies are essential to shifting social norms, disrupting patterns of complicity, and preventing potential perpetration.
 - o More broadly, empowering all citizens through community organising and grassroots solidarity initiatives—such as Austria's successful StoP programme⁴—equips individuals to intervene against VAWG in their daily lives. A common thread across these initiatives is the focus on giving people the practical means and confidence to counter gender-based violence wherever it might arise.

Primary prevention must also address the wider "permissive contexts" that allow VAWG to persist. Tackling these environments requires measures such as:

- o School-based dating violence prevention, equality-driven education that encourages critical thinking, teaching about consent and bodily boundaries from an early age and fostering media literacy. Finally, targeted awareness-raising campaigns remain important to deepen understanding among young people and the broader public about the impact of harmful gender stereotypes and restrictive gender roles.
- **Secondary prevention** aims to detect violence early and prevent its progression or escalation at an early stage, as well as provide adequate support to victim/survivors of gender-based VAWG. Evidence-based measures include:

⁴ The StoP (Stadtteile ohne Partnergewalt / "Neighbourhoods Without Partner Violence") program, originally developed in Germany and extended to Austria, works within local communities to address domestic violence at the grassroots level. By mobilising citizens as active participants, StoP aims to break the silence around partner violence and foster a culture of zero tolerance. In Austria, the program now operates in 25 local communities and emphasises community-based prevention, solidarity, and intervention by neighbours and local networks. For more details, see: https://www.stop-partnergewalt.at/stop-wien/

⁵ Professor Carol Hagemann-White's "Model of factors at play in the perpetration of violence," developed for the European Commission in 2010, provides a comprehensive review of the root causes of VAWG. This model maps how violence is perpetuated not only by individuals but also by social norms, institutional environments (such as workplaces and child protection services), and broader societal structures. It highlights the role of "conducive environments" that sustain and normalise VAWG, stressing the need for preventive action at every level by transforming policies, practices, and cultures that allow abuse to persist. For more details, see: A Different World is Possible: A call for long-term and targeted action to prevent violence against women and girls.



- Unrestrained access to women's specialist services (WSS) such as helplines, shelters, rape crisis centres, women's support centre.
- o Gender-sensitive and trauma-informed training of all professionals in contact with victims of VAWG, including guidelines on how to respond to disclosures of VAWG and DV.
- o Early intervention centres and helplines for reoffenders and potential perpetrators of gender-based VAWG⁶ and sexual abuse against children.

Parallel to these efforts in primary prevention, Europe needs to continue sustainable specialist support, in the form of women's specialist services, to manage VAWG consequences⁷.

- **Tertiary prevention** focuses on properly managing and minimising the long-term consequences of violence, supporting victims' recovery, preventing reoffending, and reducing the risk of revictimization. Core measures include:
 - Long-term psychological support and trauma-informed counselling for victim/survivors, ensuring facilitated access to social services such as housing, employment, and legal aid, as well as comprehensive perpetrator programmes designed to change behaviour, manage risk, and support safe reintegration into the community.
 - o Peer support groups, survivor advocacy, and housing-first programmes that prioritise stable accommodation for women escaping violence.

Central to all these measures is the principle that victim safety and empowerment must remain at the core, and that effective coordination among services is crucial to breaking the cycle of violence⁸.

If the next Gender Equality Strategy adopts a comprehensive approach to VAWG prevention, including coordinated primary, secondary, and tertiary actions, it can address the full spectrum of risk factors and unlock much greater transformative potential. By intentionally combining emergency interventions with long-term, tailored responses that address root causes, prevention strategies have the potential to achieve a meaningful and lasting impact, as demonstrated by the successful work of WAVE members across Europe.

⁶ For example, the "Stop it Now!" helplines, operating in several EU countries, provide anonymous advice and support for individuals concerned about their sexual thoughts, behaviours, or risk of reoffending, helping to prevent child sexual abuse before it occurs. See: https://www.stopitnow.eu/, ⁷WAVE Network. WAVE Report 2023: The Situation of Women's Specialist Support Services in Europe. Available at: https://wave-network.org/wp-content/uploads/WEB_V3.pdf

⁸ For further reading on primary prevention as the key to eliminating violence against women and girls, see WAVE - Women Against Violence Europe, "A life free from violence: Primary prevention as the key to eliminating violence against women and girls" (2023). Available at: https://wave-network.org/wp-content/uploads/WEB_V3.pdf



For example, in primary prevention, our Belgian member Garance has, since 2000, made feminist self-defence (FSD) widely accessible through peer trainer training, targeted outreach, and adaptations for all ages. These programmes strengthen women's and girls' autonomy, confidence, and boundary-setting, while community projects engage underserved groups—like older women, women of colour, and women with disabilities—through peer education and action-research on gender and public space. Garance's long-term commitment builds solidarity and generational change by equipping women and girls to challenge patriarchal norms together.

In secondary prevention, Women's Specialist Services (WSS) across Europe stand out by providing holistic, long-term support—addressing not just immediate needs during criminal proceedings but empowering women and girls beyond the aftermath of violence. WSS help survivors rebuild confidence, achieve independence, and secure safety, always recognising them as whole individuals and actively working to prevent secondary victimisation, unlike non-specialist services. Yet, despite their vital role, WSS remain underfunded. With a truly holistic prevention strategy, women and girls would have sustained support to fully recover and reclaim their place in society.

By adopting a systemic, evidence-based approach to prevention, the European Commission can ensure that all women and girls benefit from robust prevention measures and sustained, long-term support throughout their recovery. Prioritising sustainable and holistic prevention and recovery in the new Gender Equality Strategy would not only guarantee that survivors receive the comprehensive assistance they deserve but also make effective use of European taxpayer funds.

Ensuring Access to Women's Specialist Services (WSS)

Women and girls experience multiple, intersecting forms of violence that are both specific and severe in their potential for harm. Girls, particularly during adolescence, face heightened risks of child sexual abuse, grooming, sexual exploitation—including online exploitation—and trafficking. They may also be subjected to harmful practices such as female genital mutilation, early and forced marriage, harassment in schools, and sexual harassment in digital spaces. These experiences disrupt education, undermine health and well-being, and severely limit life opportunities.

Women, including young women, face a broader range of gender-based violence that often changes over the life course: intimate partner violence, marital rape, stalking, sexual assault, and harassment in public, private, and online spaces. Young women, navigating transitions into higher education and the workforce, are particularly at risk of sexual harassment and coercion in universities and workplaces, alongside discriminatory practices rooted in unequal power dynamics. Structural inequalities—lower pay, under-representation in leadership, disproportionate care responsibilities—both aggravate and are aggravated by the pervasive nature of interpersonal, sexual, domestic, economic, reproductive, and



increasingly digital violence.

As can be seen, these forms of violence are so gender-specific and so potentially harmful that assuming generic, gender-neutral services can meet the needs of survivors is a mistaken approach. Survivors require Women's Specialist Services (WSS)—such as shelters, helplines, and counselling centres— are specifically designed to address the realities of violence against women and girls and the structural inequalities that underpin it.

The EU Roadmap for Women's Rights and the Gender Equality Strategy post-2025 can only deliver on their ambitions if they prioritise survivor-centred, specialist support for women and girls. The roadmap's principle of *freedom from gender-based violence* cannot be achieved when approaches overlook the distinct structural challenges faced by women and girls. **The GREVIO mid-term evaluation of the Istanbul Convention is clear: the most effective support for survivors of VAWG is provided by women's specialist services, which cannot and should not be replaced by generic, non-specialist alternatives.**

The case for investment in WSS is reinforced by compelling economic evidence. Gender-based violence costs the EU an estimated €366 billion every year, with violence against women making up 79% of this cost—€289 billion—driven in part by substantial losses in productivity and work status⁹. Studies from the UK and Italy show that **every £1 invested** in women's specialist services generates up to £11 in social value10, and women who can access tailored, trauma-informed support report up to a 90% reduction in stress and anxiety—restoring well-being, economic participation, and the ability to rebuild their lives ¹¹. Conversely, underfunded women's specialist services are forced to limit support to crisis response, leaving survivors without the long-term recovery resources they need.

Women's Specialist Services are thus not only a human rights obligation, but a sound economic strategy. By making binding commitments, securing sufficient and sustainable funding, and embedding robust monitoring and enforcement in line with Directive (EU) 2024/1385 and the Istanbul Convention, the EU can translate political commitments into tangible change—ensuring a gender-equal, violence-free Europe where all women and girls have access to the specialist support they need.

⁹ European Institute for Gender Equality. "Costs of Gender-Based Violence." Accessed July 2025. https://eige.europa.eu/gender-based-violence/costs-of-gender-based-violence?language_content_entity=en.

¹⁰ Due to a significant reduction in: police and social services interventions, need for emergency housing, hospital costs, lost working hours to the economy on top of a significant reduction in human trauma and long-term impact of violence.

¹¹ Hidden Value: Demonstrating the Extraordinary Impact of Women's Voluntary and Community Organisations, Women's Resource Centre, London, 2011; Violenza sulle Donne. Non c'è più tempo: Quanto vale investire in prevenzione e contrasto. Analisi SROI delle politiche d'intervento, Università Bocconi, WeWorld, 2016.



Femicide legislation and adequate data collection

Femicide—the gender-based killing of women because they are women—remains a grave and persistent problem across Europe. The WAVE 2023 Country Report¹² identifies critical gaps and urgent needs in both the prevention and monitoring of femicide in the EU. The latest EIGE Policy Brief on Femicide (2025)¹³ shows the gendered scale of the problem: between 2014 and 2022, women made up 87% of victims in intimate partner homicides, 60% of victims in all domestic homicides, and 42% of total homicide victims in the EU-27. These numbers confirm that femicide is not a marginal phenomenon but the most extreme and fatal manifestation of violence against women and girls (VAWG).

Despite clear evidence, femicide remains under-recognised and insufficiently measured. Too often, it is categorised under the neutral term "homicide," which obscures the gendered motive and the structural inequalities that underpin it. While a handful of Member States—such as Cyprus, Malta, and Italy—now recognise femicide as a specific offence, most do not, leaving legal definitions inconsistent and fragmented across the EU. This results in widely varying standards of protection, prosecution, and justice for women and girls.

A key contributor to this fragmentation is the lack of an EU-wide, harmonised data system. As the WAVE 2023 Country Report underlines, many Member States either do not collect data on femicide at all or collect it only in limited contexts—often confined to intimate partner or family homicide. Where data do exist, they rarely include detailed contextual information such as perpetrator-victim relationship, location, motive, or intersectional vulnerabilities. Consequently, the true scale, diversity, and trends of femicide cannot be accurately measured, nor can the effectiveness of EU-level interventions be assessed over time.

Certain groups are particularly at risk. Migrant, undocumented, and bicultural women face heightened vulnerabilities due to legal and economic dependency, precarious residence status, social isolation, and systemic barriers in accessing protection and support. Cultural, linguistic, and administrative obstacles often prevent them from seeking help or lead to misclassification of their deaths, especially where family or community pressures are involved. As a result, their cases may be underreported, further compounding the gaps in prevention, intervention, and data collection. Addressing femicide in the EU therefore requires an explicit intersectional approach that recognises and responds to the specific risks faced by migrant and bicultural women, ensuring that EU and national policies, data frameworks, and prevention strategies are genuinely inclusive of all women, regardless of origin or status.

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¹² WAVE Country Report 2023: The status and value of women's specialist services in preventing and tackling gender-based violence against women, pp. 67-73, Vienna, December 2023. Available at: https://wave-network.org/wp-content/uploads/WAVE CountryReport2023.pdf.

¹³ EIGE (2025). Policy Brief on Femicide: Improving the collection of national administrative data on femicide in the EU. European Institute for Gender Equality, Vilnius. Available at: https://eige.europa.eu/sites/default/files/documents/eige-policy-brief-on-femicide-2025.pdf



One of the **biggest structural barriers is that VAWG is not yet recognised as a specific "Eurocrime" under EU law**. This omission means that the EU lacks the legal authority to set binding minimum standards for criminalisation, data collection, and prevention across Member States. The recent *Directive (EU) 2024/1385 on Combating Violence Against Women and Domestic Violence*—while ground-breaking—does not include femicide as a distinct offence, nor does it address other gender-specific crimes such as honour-based killings, dowry-related murders, deaths from unsafe abortion, or killings linked to restricted sexual and reproductive health access.

This is a missed opportunity. The scheduled revision of the Directive is the moment to close this gap. Recognising VAWG as a Eurocrime, and explicitly criminalising femicide, would provide the EU with a robust legal foundation for coordinated prevention, prosecution, and comprehensive, comparable data collection. It would also guarantee more uniform protection and justice standards for all women and girls across the Union–regardless of where they live.

Until these legislative changes are made, the Gender Equality Strategy post-2025 should—under Article 44 of Directive (EU) 2024/1385—establish a mandatory, harmonised EU-wide framework for the collection of administrative and contextual data on all forms of femicide. This should require:

- o Intersectional indicators to capture the diversity of femicide cases (including intimate partner femicide, honour crimes, dowry killings, killings linked to denial of reproductive rights, conflict-related femicide).
- Disaggregation by factors like perpetrator relationship, crime context, victim's migration status, age, disability, ethnicity, sexual orientation, and prior contact with support services or law enforcement.
- o Consistent monitoring and public reporting at both national and EU levels to enable evidence-based policymaking and accountability.

Femicide prevention cannot rely solely on legislative change. A multidimensional approach is essential—one that strengthens legal provisions, builds robust data systems, and invests in feminist civil society organisations at both national and EU levels. Grassroots women's organisations are indispensable for raising awareness, supporting families of victims, collecting detailed and disaggregated data, and crafting prevention tools that reflect the realities of diverse communities. Prevention strategies must be inclusive of racialised, migrant, disabled, and lesbian women's experiences, and must address the entire continuum of gender-based violence leading up to femicide.

Closing legislative, policy, and data gaps on femicide should be a top priority in the next Gender Equality Strategy. Legal recognition as a Eurocrime, expansion of the Directive to cover all forms of femicide, harmonised data frameworks, intersectional approaches, and strong grassroots engagement are all essential. Only by embedding femicide prevention



within a broader, inclusive vision for gender equality and human rights can Europe decisively move towards eradicating this most extreme violation of women's and girls rights.

Feminist Civil Society Initiatives: Filling the Gaps in Femicide Data and Prevention in Southern Europe

Despite insufficient political support and scarce resources, feminist and women's organisations across Southern Europe have stepped up to fill critical gaps in state action against femicide. These civil society organisations have established national and European **Femicide Observatories**—such as the Malta Observatory on Femicide, Portugal's UMAR Observatory of Murdered Women, and Spain's Feminicidio.net—to collect and document cases, often providing more nuanced and comprehensive gender-specific data than official statistics. In Italy, for example, *La Casa delle Donne di Bologna* includes suicides recognised as related femicides in their data. **These observatories are especially vital where legal recognition of femicide is limited, and official data is inadequate.**

The Istanbul Convention and its monitoring body GREVIO¹⁴has called for the establishment of **femicide reviews as best practice**, defining them as multiagency reviews systematically examining all gender-related killings to identify missed opportunities for intervention and lessons to prevent future deaths ¹⁵. Portugal's *Retrospective Analysis Team* stands as a model for these standards, while in other countries, such as Cyprus and Malta, reviews and risk responses remain inconsistent. **Now that the European Union has acceded to the Istanbul Convention, it is both timely and essential for the EU to strengthen femicide prevention**, data collection, and the implementation of standardised femicide reviews in line with GREVIO's recommendations.

These efforts by feminist organisations show that effective monitoring and prevention of femicide are possible even with scarce resources—a promising

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¹⁴ Council of Europe Convention on Preventing and Combating Violence Against Women and Domestic Violence, commonly known as the Istanbul Convention, which is the first legally binding European treaty aiming to prevent violence, protect victims, and prosecute offenders. The Convention emphasises not only prevention and victim support, but also robust data collection and systematic reviews of femicide cases. Its implementation is independently monitored by GREVIO (Group of Experts on Action against Violence against Women and Domestic Violence)—a panel of impartial, international experts who evaluate country compliance, publish recommendations, and push for effective action.

¹⁵ According to GREVIO, such reviews require analysing all previous contact between victims (and perpetrators) and support services, intersectoral coordination, detailed case data collection, and the formulation of recommendations for better prevention and response policies. Council of Europe, GREVIO (Group of Experts on Action against Violence against Women and Domestic Violence), 5th General Report on GREVIO's Activities, covering the period from January to December 2023, Strasbourg, October 2024. Available at: https://rm.coe.int/5th-general-report-on-grevio-s-activities/1680b1f78f.



practice the European Commission should build on. However, these initiatives compensate for responsibilities that belong to member states. If the European Commission is truly committed to defending the rights of women and girls—as set out in Principle 1 of the Roadmap for Women's Rights—its next Gender Equality Strategy must establish a European Observatory on Femicide and Gender-based Violence, introduce systems of femicide reviews to identify missed intervention opportunities, and ensure active involvement of feminist civil society in prevention, training, and monitoring at all levels. Only such an integrated approach will guarantee every case of femicide is recognised, every response gap addressed, and the rights to safety and justice for women and girls upheld across Europe.

Preventing technology-facilitated violence against women and girls (TFVAWG) in the face of anti-equality polarisation

Technology-facilitated violence against women and girls (TFVAWG) is an extension of the continuum of violence that women and girls already face offline; digital spaces have dramatically increased both the scale and visibility of harassment, abuse, and misogyny. The development of online platforms, social media, and emerging technologies has not created new kinds of violence but has amplified pre-existing harms and enabled their reach and impact to widen. Online violence is inseparable from offline inequalities and is shaped by structural factors that make women and girls, especially the young, racialised, with disabilities, and migrant among them, particularly vulnerable.

According to the FRA's EU Fundamental Rights Survey, **13% of women in the EU have experienced cyber harassment in the past five years, rising to 27% among young people aged 16-29**¹⁶. Cyberstalking and image-based sexual abuse (such as revenge porn) are increasingly common: one in ten women (11%) have experienced some form of cyber harassment since age 15. Large-scale research published in 2025 across ten European countries found that **22.6% of respondents had experienced at least one type of image-based sexual abuse, with women reporting far greater harm than men¹⁷. The EIGE Gender Equality Index 2024 confirms a worrying upward trend in all forms of**

¹⁶ FRA's Fundamental Rights Survey: European Union Agency for Fundamental Rights (FRA), Fundamental Rights Survey, 2020/2021-2024. https://fra.europa.eu/en/youth; https://fra.europa.eu/sites/default/files/fra_uploads/fra-2021-crime-safety-victims-rights_en.pdf

¹⁷ Rigotti, C. (2024). "Image-Based Sexual Abuse and EU Law: A Critical Analysis," German Law Journal. https://www.cambridge.org/core/journals/german-law-journal/article/imagebased-sexual-abuse-and-eu-law-a-critical-analysis/B0CF334A0037DE3CA2067B79F506EB87; European Institute for Gender Equality (EIGE), Combating Cyber Violence against Women and Girls, 2024. https://ec-europa-eu.libguides.com/cyber-violence-against-women/eu-publications/selected



technology-facilitated violence, especially among young women, adolescent girls, and intersectional groups such as women and girls with disabilities and migrant women¹⁸.

At the same time, technology has facilitated the rapid spread and amplification of hateful ideologies—including anti-gender and anti-equality narratives—that are part of a wider backlash against women's rights. These digital ecosystems not only normalise misogyny but encourage behaviour that further entrenches offline violence and discrimination. Rates of online violence against women and girls continue to climb, and forms of abuse are evolving as perpetrators exploit new platforms and tools, ranging from encrypted messaging apps to Al-enabled deepfakes and manipulative content generation. The consequences for survivors include lasting trauma, reputational harm, economic exclusion, and barriers to social participation.

It is against this backdrop that emerging anti-equality and anti-gender movements online must be understood: not as isolated causes, but as part of a broader landscape in which technology enhances, intensifies, and perpetuates gender-based violence. These movements represent just one facet of a wider digital backlash, in which harmful ideologies and coordinated online networks fuel real-world consequences for women and girls.

One of the most worrying challenges now emerging in Europe is the growing polarisation around gender equality and women's rights among younger generations, heightened by the visibility and influence of anti-equality and anti-gender movements online. This trend is particularly acute among boys and young men, whose conservatism is being fuelled by misogynistic digital ecosystems such as the "manosphere." Here, backlash against gender equality is not incidental nor simply a matter of shifting opinions—it is symptomatic of a deeper, more dangerous trend: young men, seeking identity and belonging, are increasingly drawn into online and offline communities that promote misogynistic worldviews, male victimhood narratives, and frames in which gender equality is depicted as "anti-male." ¹⁹

These groups actively normalise physical abuse, sexual violence, dehumanisation, derogatory behaviour towards women and girls, as tools for "male redress." This situation is taking place both online and offline, and it is part of the continuum of violence against women. They comprise various types of groups²⁰ that take advantage of boys and young men's need for connection and weaponize it into behavioural change through coordinated harassment and violence²¹. The immediate impact is a surge in online and

¹⁸ EIGE, Gender Equality Index 2024: Violence Domain. https://eige.europa.eu/gender-equality-index/2024/domain/violence

¹⁹Also known as "misandry" or prejudice against men, often weaponised by manosphere groups to frame gender equality as discriminatory.

²⁰ INCELS (involuntary celibates), "men's rights activists," "pick-up artists," the "men going their own way" movement, and "red pill ideologues", among others.

²¹Manosphere groups promote: Physical/sexual abuse, dehumanisation, derogatory behaviour, and rape culture. For details, see *UN Women, "What is the manosphere and why should we care?"*



offline instances of VAWG. Over the medium term, we risk eroding decades of progress as these attitudes turn into behaviour, and long-term, intergenerational misogyny threatens structural oppression of women/girls. This regression is corroborated by a 2022 UN Women and Unstereotype Alliance study, revealing that young men aged 16-19 hold significantly more traditional attitudes than their female peers, with 58% of young men in Vietnam endorsing gender-stereotyped job roles and 38% in Sweden believing men deserve priority employment during scarcity²².

Despite the gravity of this crisis, current strategies for preventing TFVAWG remain woefully inadequate. One major reason is the lack of interest in understanding the multiple layers of violence women face online, as well as the failure to recognise the continuum of violence, including structural and institutional violence against women. While EU debates on TFVAWG rightly address a range of online crimes, such as those covered by the EU Directive on VAW and DV (Articles 5 to 8: cyberstalking, cyber harassment, incitement to violence or hatred, and non-consensual sharing of intimate or manipulated material), they often overlook other systemic forms of TFVAWG. These include economic abuse online, the amplification of discriminatory stereotypes through online hiring tools, the spread of extremist and misogynistic beliefs, and other harmful behaviours that, regrettably, are not yet illegal, but still cause significant harm.

Some may argue that this gap is a result of the rapid development of online tools and the increasingly sophisticated ways these tools are exploited for TFVAWG, making it difficult for legislation to keep pace with technology. However, a deeper issue lies in the fragmentation of efforts to address TFVAWG. The development of the digital sphere and digital economy in Europe often fails to account for how technology and AI can amplify the structural barriers women already face offline. As a result, critical discussions about Europe's digital transition have not sufficiently considered the potential impact on women and girls.

For example, the Digital Services Act (DSA) defines four categories of systemic risk, yet only one specifically mentions gender-based violence. This raises the question: why was the potential for online violence against women and girls not considered in the other three risk categories? Furthermore, the implementation of the DSA has not adequately addressed the intersectionality of online harms, which should be a central part of risk assessments and mitigation measures. Content moderation is another area where action is lacking. Automated systems often miss the contextual nuances of what is harmful in different settings, and if these systems are trained on biased data, they risk reinforcing those biases. Moreover, content moderation is not treated as a priority, and the costs of human

Explainer, 15 May 2025, https://www.unwomen.org/en/articles/explainer/what-is-the-manosphere-and-why-should-we-care.

²²UN Women and Unstereotype Alliance, *The Levers of Change: Gender Equality Attitudes Study 2022* (2022), https://www.unstereotypealliance.org/sites/default/files/2023-09/the_levers_of_change_2022.pdf



moderation are often shifted onto civil society organisations, who are left to flag problems that platforms themselves should be designed to prevent.

To genuinely advance gender equality in Europe's digital future, the EU must integrate a substantive gender perspective into all digital policymaking–from design to regulation and enforcement. This requires moving decisively beyond tokenistic gender mainstreaming by embedding a comprehensive gender lens into every facet of digital innovation, risk assessment, and governance. Only through such an approach can digital spaces be safe by design and the rights and dignity of women and girls be truly protected.

While the Roadmap appropriately emphasises the need for a safe digital environment for women and girls, these commitments must be translated into stronger, enforceable actions. Hence, the next Gender Equality Strategy should set out clear mandates for meaningful platform accountability and robust, gender-sensitive content moderation. This would ensure that social media and tech companies are held to concrete, enforceable standards—not merely encouraged to follow voluntary codes—when it comes to preventing and addressing violence against women and hate online.

Furthermore, Principle 6 of the Roadmap on Education and Digital Skills should contain explicit requirements to integrate digital literacy, online safety, and gender equality throughout all educational curricula. Investments must be made to equip young people—especially boys and young men—to resist online misogyny, hate, and the narratives promoted by anti-gender movements.

Additionally, the strategy should commit to comprehensive and intersectional data collection on technology-facilitated gender-based violence. Building on its encouragement of gender-sensitive research, the Commission should require the collection and reporting of disaggregated data that reflects the lived experiences and vulnerabilities of women and girls, so that policies and interventions are genuinely evidence-based.

Finally, the new Strategy must demand stronger, more coordinated national action plans and foster cross-sectoral cooperation. Digital safety must be treated as a core element of gender equality policy and programming, rather than as an afterthought, to prevent the fragmentation of efforts and ensure a consistent, robust response across all Member States. By reinforcing these specific areas, the EU will be far better equipped to safeguard the rights, participation, and safety of women and girls, ensuring that gender equality keeps pace with the rapid digital transformation of European society.

Addressing the Needs of Migrant Women by Tackling Institutional Violence and Care Work Inequalities

A significant and **unacceptable gap** in the European Commission's Roadmap for Women's Rights is its **failure to explicitly recognise and address the realities faced by migrant and refugee women in Europe**. This omission cannot be reproduced in the forthcoming



Gender Equality Strategy if the EU is serious about its commitments. Migrant womenespecially those who are bicultural, racialised, or with precarious legal status—experience highly specific and severe forms of gender-based violence. These include discrimination, labour and sexual exploitation, forced marriage, and marital captivity, many of which remain largely unrecognised in both national and European policy frameworks. Too often, these acts occur within transnational contexts—whether in the process of migration, across borders, or while navigating Europe's uneven legal and social systems—and demand responses that reflect their complexity and scope.

Migrant women are additionally exposed to unique vulnerabilities shaped by legal and economic dependency on male partners, particularly in the context of marriage migration. This dependency not only increases their risk of violence and abuse but also systematically undermines their autonomy, access to justice, and pathways to protection. **Empowerment and pay equity policies remain largely inaccessible so long as these women's fundamental rights, legal status, and economic independence are unsecured.** Such layered barriers demand the explicit creation of policy frameworks within the next Gender Equality Strategy to provide tangible legal and social supports for migrant, refugee, and racialised women.

Another deeply entrenched but often hidden aspect of this challenge is the burden of care and domestic work—a central theme under Principle 4 (work-life balance) of the Roadmap. The European care economy relies heavily on the labour of women: recent data show that **over 9 million people work in domestic and care services in the EU, and between 83-95% of these workers are women**. EU mobile and migrant women form the backbone of this sector, which is structured by a racialised and gendered hierarchy of labour. The contribution of EU and non-EU migrant women is particularly notable in live-in, personal care and domestic work arrangements, often carried out under precarious and informal conditions²³.

The privilege of work-life balance enjoyed by some is built upon the precarious, unprotected, and often exploitative working conditions endured by migrant and racialised women, many of whom lack contracts, fair pay, or basic labour rights. Across the EU, around 6.8 to 9.2 million people are undeclared workers in the personal and household services (PHS) sector, and even among declared workers, nearly 2 million lack equal labour rights. In total, up to half of all care and domestic service workers are undeclared, working without contract or social protection, with migrant and racialised women most exposed to exploitation²⁴. For the next Gender Equality Strategy to deliver on Principle 4, it must not shield one group while leaving others unnamed, underprotected,

²³ European Institute for Gender Equality (EIGE), "Guaranteeing gender equality in the domestic work sector," 2023; HIPATIA PRESS, "The Domestic Work Sector in the EU"; ENAR, "Care work is essential work: an intersectional struggle for justice and liberation," 2023.

²⁴ European Labour Authority (ELA), "Tackling undeclared work in the personal and household sector," 2023; Eurofound, "Undeclared care work in the EU"; EUAgenda/ELA, "Care: Work that matters for decent work and social protection," 2023.



and invisible. Such structural exclusion perpetuates institutional violence, upholds cycles of exploitation, and fundamentally contradicts EU values of equality and human dignity²⁵.

Addressing these inequalities requires the European Commission to **structurally partner** with and fund "by-and-for" feminist grassroots organisations representing migrant, racialised, and marginalised women, ensuring programme implementation, co-design, and monitoring are firmly rooted in lived experience and community expertise. Only through meaningful engagement and direct support of these organisations can policies be tailored, accessible, and effective.

These forms of violence against migrant and refugee women are exacerbated by the EU's own migration, asylum, and labour policies, which foster a culture of "illegality" and exclusion. Restrictive legal frameworks and precarious residence statuses not only create conditions in which violence thrives but also fuel a climate where survivors are forced into silence and vulnerability, fearing deportation, detention, or loss of livelihood. Such structural and institutional violence at the core of the EU demands urgent action and a change of course.

Institutional violence—perpetrated by state actors such as police, courts, child protection, or health services through harmful practices, neglect, or systemic discrimination—remains a pervasive barrier to justice and recovery for survivors of violence against women and girls, particularly those with intersecting marginalisations, such as migrant, refugee and racialised women, but is an overarching problem for all women in Europe. Addressing this form of violence requires **embedding gender-sensitive and intersectional approaches across justice, law enforcement, and health systems, and holding institutions accountable for perpetuating misogyny, racism, and xenophobia.** True transformation demands that the EU move beyond a minimalist focus on "access to justice" towards a genuine, survivorcentred model that prioritises autonomy, dignity, and repair for all women. Tackling institutional violence must be a cross-cutting pillar in the next Gender Equality Strategy, explicitly recognised and systematically addressed—ideally as part of the Roadmap's Principle 8 commitment to robust, inclusive, and accountable institutions.

The EU's Gender Equality Strategy must not repeat the historical exclusion of migrant, refugee, and other marginalised women. Whether through the creation of a new principle or by explicit reinforcement under Principle 8, the strategy must put in place concrete supports, legal protection, and institutional reform, demonstrating a true commitment to equality, dignity, and justice for every woman and girl in the European Union.

²⁵ Equinet, "Domestic and Care Workers in Europe: Discrimination and Exploitation Across Borders," 2021; ENAR, "Care work is essential work: an intersectional struggle for justice and liberation," 2023.



Gender-sensitive preparedness and human security

A gender-equal and resilient Europe requires more than addressing inequalities in stable times; it demands a fundamental rethinking of how the European Union defines security and responds to crises. The EC Roadmap for Women's Rights sets out important principles to tackle structural discrimination and uphold women's rights. However, a critical gap remains: the absence of a principle or integrated approach addressing preparedness and human security from a gender perspective. This omission is particularly striking in the context of recent overlapping crises—including war, climate change, pandemics, and democratic backsliding—that have exposed how women and girls, especially those already marginalised, are uniquely and disproportionately affected.

The prevailing concept of security in many EU policies continues to focus on reactive and militarised solutions. Yet **real security for women and girls involves** much more: it means **safeguarding dignity, rights, physical integrity, and access to services even in times of upheaval.** Experience has shown that emergencies and societal shocks—from armed conflict to public health crises and climate disasters—intensify gender-based violence, increase economic precarity, and diminish women's participation in decision-making and public life. The EU's Gender Equality Strategy post 2025 must therefore embed a proactive, gender-responsive approach to preparedness that aims to prevent, mitigate, and address these impacts before, during, and after a crisis.

Feminist security emphasises the protection and empowerment of individuals, particularly women, girls and marginalised groups, within frameworks that prioritise human dignity, safety, and agency over traditional militarised notions of security. This perspective is closely aligned with the concept of *human security*, first defined by the United Nations Development Programme (UNDP) in 1994, which shifts focus from the security of states to the security of individuals, covering economic, food, health, environmental, personal, community, and political security. The Women, Peace, and Security (WPS) agenda, established through United Nations Security Council Resolution 1325 and its subsequent resolutions, reinforces the critical importance of a gendered perspective in peacebuilding, conflict prevention, and security. These resolutions call for the meaningful participation of women in security decision-making, the protection of women and girls during conflict, and the systematic mainstreaming of gender in peace and security efforts.

Incorporating feminist and human security approaches ensures that security efforts address the complex, intersectional realities faced by women and girls, including exposure to VAWG, displacement, and barriers to essential services, particularly during crises. Such an approach demands moving beyond militarised responses, emphasising prevention, resilience, participation, and empowerment as the foundation of security policy.

Civil society, and women's rights organisations in particular, are pillars of community-level resilience. Their roles span from delivering essential services for survivors of violence, supporting marginalised groups, and strengthening democratic accountability to rebuilding trust and social connection in fragmented societies. Yet these organisations face



chronic underfunding and are often excluded from crisis response planning, making it difficult to reach those most at risk when disasters strike. The EU must recognise and invest in the unique expertise and flexibility of feminist civil society, ensuring that emergency preparedness, recovery, and security frameworks provide long-term support, not just one-off interventions.

Integrating gender equality into preparedness is not only a matter of justice but of effective crisis management. All preparedness plans must systematically assess the differentiated impact of emergencies on women and girls, fully accounting for intersectional realities—such as migration status, disability, or race. Critically, women and girls must be active decision-makers in the design and implementation of crisis prevention, management, and recovery policies at every level. Where women participate equally in disaster preparedness and peace processes, evidence shows outcomes are more sustainable and societies recover more effectively.

To make this vision a reality, the EU's Gender Equality Strategy post 2025 should ensure that gender mainstreaming is not confined to peacetime policymaking but fully integrated across all security, preparedness, and crisis response policies and funding instruments. Embedding gender equality at the core of Europe's resilience agenda will enhance the EU's compliance with its international human rights obligations and the promises of the WPS agenda, upholding the commitment that no one–especially women and girls–is left behind in times of crisis and uncertainty.

Ultimately, incorporating a gendered principle on preparedness and human security into the next Gender Equality Strategy will close a significant strategic gap in the EU's commitment to equality and resilience. It will bridge the persistent divide between equality and security policies, respond to the lived experiences and vulnerabilities of women and girls as they face new and complex risks, and affirm the indispensable role of feminist civil society as leaders in building a safer, more inclusive, and future-proof Europe.



In closing, WAVE calls on the European Commission to seize this transformative moment. The next Gender Equality Strategy must be rooted in comprehensive, life-course prevention and investment in women's specialist services, so that the EU can move beyond symbolic gestures to create truly systemic change. This Strategy should address urgent challenges, including the sharp rise in tech-facilitated violence against women, and the need for robust, up-to-date responses in this evolving landscape. It is imperative to highlight the significant gaps affecting migrant, refugee, and racialised women whose specific needs and realities remain largely invisible in current texts, and to ensure these are fully addressed moving forward.

WAVE stresses that investing in primary prevention addresses the systemic causes of VAWG and is also an economic sound decision, especially in times when resources are scarce. Adopting a feminist approach to security, centred on human security, will better prepare the EU for future uncertainties, whether from war or environmental disaster. The introduction of new legislation to make VAWG, including femicide, as an Eurocrime, is urgent.

We strongly caution against gender-neutral approaches to VAWG, which risk erasing the disproportionate impact on women and girls and undermining targeted, effective interventions.

WAVE urges the Commission to demonstrate leadership by committing to bold, evidence-based measures that challenge and dismantle the structures enabling gender-based violence against women and girls.

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