

# THE IMPORTANCE OF FEMINIST APPROACHES IN TACKLING (AI-DRIVEN) GENDERED DISINFORMATION TO COUNTER ELECTION INTERFERENCE

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# BACKGROUND

On the 1st of December 2024, a new European Commission took office. During its first month, the Commission provided observers with an important overview of the policy objectives it will prioritise during this new EU Mandate (2024-2029) - identifying over 160 policy initiatives across a range of sectors. While individual members have acknowledged the importance of combatting (AI-driven) gendered disinformation and its impact on electoral processes<sup>2</sup>, an initial analysis of the Commission's prospective initiatives highlights a lack of distinct attention to the issue thus far. This briefing highlights the urgency of addressing the issue of gendered disinformation in order to safeguard progress towards gender equality and democratic integrity in the EU - and provides recommendations for the formulation of inclusive policy initiatives to that end.

<sup>1</sup> EU Matrix 2025. Updates: Over 160 upcoming EU policy initiatives. <https://tinyurl.com/38j3uhzb>

<sup>2</sup> EU Commissioner for Democracy, Justice, the Rule of Law and Consumer Protection, Michael McGrath, has specifically mentioned gendered disinformation a number of times (including during his Confirmation Hearing on 5th November 2024).



# INTRODUCTION

Gendered disinformation is a critical issue for the EU as it directly impacts the Union's commitment to gender equality, the prevention of gender-based violence (GBV), and the protection of democratic integrity. As a self-declared leader in advancing gender equality, the EU has made substantial commitments through its third Gender Action Plan (GAP III), pledging to address GBV, promote the rights of women and gender minorities, and safeguard their participation in public life. Gendered disinformation undermines these commitments by disproportionately targeting women and LGBTQI\* individuals, often seeking to silence them and drive them out of public spaces, including politics and media. This not only endangers democratic participation but also erodes broader public trust in democratic processes<sup>2</sup> - as gendered disinformation can also be weaponised to undermine faith in democratic institutions, disrupt human rights advocacy, sow division and polarization, weaken multilateral structures and deter governments from pursuing key policy goals.<sup>3</sup>

The EU has already taken strides to address disinformation more broadly, with initiatives such as the 2020 European Democracy Action Plan and the 2022 Digital Services Act (DSA), which aim

to increase transparency, limit the spread of harmful content, and protect fair elections. Notably, the DSA makes reference to "any actual or foreseeable effects in relation to gender-based violence". These existing frameworks show that the EU is aware of the threat disinformation poses to democratic integrity and fundamental rights. They have also created an important foundation for further action against gendered disinformation specifically. However, so far only the non legally binding European Declaration of Digital Rights and Principles for the Digital Decade of the EU commit to protecting citizens against gendered disinformation, specifically.<sup>5</sup>

In an international environment marked by rising political tension and polarisation, tackling gendered disinformation is particularly urgent. As hostile actors increasingly deploy gendered disinformation as a tactic to interfere in elections, erode democratic stability, and undermine public trust, there is significant momentum for the EU to expand its leadership in this area. Strengthening protections against gendered disinformation will reinforce the EU's commitment to free and fair elections and help build a resilient, inclusive democratic landscape across its member states.

<sup>2</sup> Nina Jakowicz et al, 2021, *Malign Creativity: How Gender, Sex, and Lies Are Weaponized against Women Online* (Washington, D.C.: Wilson Center); Lucina di Meo and Saskia Brechenmacher 2020, "Tackling Online Abuse and Disinformation Targeting Women in Politics" (Washington, D.C.: Carnegie Endowment for International Peace), [rb.gy/zx7fQ](https://rb.gy/zx7fQ); Kristina Wilfore 2021, *The Gendered Disinformation Playbook in Germany Is a Warning for Europe*, Brookings Tech Stream (Washington, D.C.: Brookings), [rb.gy/e6m7h](https://rb.gy/e6m7h).

<sup>3</sup> Lucina Di Meo and Kristina Wilfore, 2021, 'Gendered disinformation is a national security problem,' Brookings Institute. March 8 2021. <https://t.ly/PtQh/>; Samantha Bradshaw and Amélie Henle 2021, "The Gender Dimensions of Foreign Influence Operations", *International Journal of Communication* 15: 4596–618.

<sup>4</sup> Martha Stolze 2024. 'Digital Policy. Approaches Against Gender-Based Digital Violence and Gendered Disinformation', in Claudia Zilla: *Feminist Foreign and Development Policy in Practice*. Stiftung Wissenschaft und Politik (SWP). <https://t.ly/KQymf>.

<sup>5</sup> Martha Stolze 2024. 'Digital Policy. Approaches Against Gender-Based Digital Violence and Gendered Disinformation', in Claudia Zilla: *Feminist Foreign and Development Policy in Practice*. Stiftung Wissenschaft und Politik (SWP). <https://t.ly/KQymf>.

## 2. DEFINITION OF GENDERED DISINFORMATION

A growing body of feminist research has shown that disinformation disproportionately targets women and gender minorities, leading to a specific form of identity-driven disinformation known as *gendered disinformation*.<sup>6</sup> This kind of disinformation involves the creation and dissemination of content that encompasses gender-based attacks or weaponizes gendered narratives or stereotypes to fulfil political, social, or economic goals.<sup>7</sup> It is often marked by falsity, malign intent, and coordination.<sup>8</sup> It uses gender-based attacks to discredit women and candidates from sexual and gender minorities, undermine their credibility, and limit their participation in public life, often reinforcing harmful stereotypes.<sup>9</sup>

# 3. THE INDIVIDUAL AND SOCIETAL IMPACT OF GENDERED DISINFORMATION

**Individual Impact:** Gendered disinformation functions as a form of **technology-facilitated gender-based violence (TFGBV)**, attacking individuals on a personal level by deploying misogynistic tropes to degrade their character.<sup>10</sup> These attacks, often aimed at limiting freedom of expression, have the effect of silencing women and pushing them out of public spaces, including politics and the media. Women with intersecting identities are generally targeted more often with additional racialised, ableist, homophobic, and/or religiously motivated attacks often compounding the harm caused.

**Societal Impact:** Beyond individual harm, gendered disinformation can cause structural damage to our democracies when it targets policy objectives or movements aimed at advancing human rights and gender equality. This kind of disinformation is often designed to provoke moral panic around gender and sexuality issues, counteract the influence of so-called „gender ideology,“ and hinder support for policies related to sexual and reproductive health and rights (SRHR) or LGBTQI\* rights.<sup>11</sup> In some cases, authoritarian actors leverage gendered disinformation to consolidate power by vilifying gender minorities, fostering division, eroding trust in democratic institutions, and stifling calls for government accountability.<sup>12</sup>

<sup>6</sup> Lucina Di Meo and Kristina Wilfore, 2021, 'Gendered disinformation is a national security problem,' Brookings Institute. March 8 2021. <https://t.ly/PltQh/>

<sup>7</sup> Ellen Judson et al. 2020, Engendering Hate. The Contours of State-Aligned Gendered Disinformation Online. Demos. <https://t.ly/RJRF2>.

<sup>8</sup> Jankowicz et al. 2021, Malign Creativity.

<sup>9</sup> Irene Khan 2023, Gendered disinformation and its implications for the right to freedom of expression – Report of the Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression, UN General Assembly A/78/288, <https://t.ly/vCsfB>.

<sup>10</sup> Nina Jankowicz et al. 2024, It's Everyone's Problem. Mainstreaming Responses to Technology-Facilitated Gender-Based Violence, Institute of Global Politics, <https://t.ly/gJQAv>; Social Development Direct 2023, Technology-Facilitated Gender-Based Violence: Preliminary Landscape Analysis, The Global Partnership for Action on Gender-Based Online Harassment and Abuse, <https://t.ly/3yGI3>.

<sup>11</sup> Andrea Dip 2022, Gender Ideology - A Fantastical and Flexible Narrative. Heinrich Böll Stiftung, <https://t.ly/Lerq>.

<sup>12</sup> Lucina Di Meo and Kristina Wilfore, 2021, 'Gendered disinformation is a national security problem,' Brookings Institute. March 8 2021. <https://t.ly/PltQh/>

# 4. MAIN ACTORS SPREADING GENDERED DISINFORMATION

At the heart of gendered disinformation lies a deliberate exploitation of power dynamics. Both state and non-state actors strategically target women and gender minorities to uphold traditional gender hierarchies, perpetuating inequality by silencing voices that challenge these norms. In this way, gendered disinformation becomes a tool of social and political control, further marginalising already vulnerable groups while solidifying the power structures that benefit from their exclusion.

Gendered disinformation is spread by a diverse range of actors, including:

- ▶ Authoritarian states such as Russia and China and state-aligned actors seek to control narratives around gender and sexual identities. Gendered disinformation and anti-gender narratives have been used by state actors to form discourse coalitions against ‘the liberal west’ and to destabilise democracies.<sup>13</sup>
- ▶ Political parties and (male) political candidates utilize gendered disinformation as a tool to undermine and discredit their political opponents by way of attacking women and gender minorities in positions of power.<sup>14</sup>
- ▶ Online (far) right-wing groups and the anti-gender movement: An increasingly transnational movement of conservative to far-right actors, conservative think tanks, the Catholic Church, and ‘concerned citizen initiatives’ has formed around anti-gender issues. The anti-gender movement frames liberal gender and sexuality norms and feminism as a threat to social order. It opposes policy goals related to, for example, SRHR and LGBTQI\* rights, arguing that such goals destroy the core identity of men and women and the basis of the traditional family, thus threatening entire societies. The anti-gender movement often uses gendered disinformation to further its objectives.<sup>15</sup>
- ▶ Influencers and fringe media outlets promote sensationalised or false information about gender-related issues to build an audience, drive engagement, or push ideological goals. These actors frequently use AI-driven tools to amplify their messages across both mainstream social media platforms and more private, encrypted messaging apps.

# 5. CHANNELS AND PLATFORMS OF DISTRIBUTION

▶ **Social media platforms:** Platforms like **Facebook, Twitter/X, and YouTube** are central to the spread of gendered disinformation, where algorithms help amplify sensational, misleading content to maximise user engagement. This situation is exacerbated by developments like Meta’s decision to eliminate fact-checking measures in the US.

▶ **Private messaging apps** such as **WhatsApp and Telegram** serve as closed networks where disinformation spreads more covertly, often complicating efforts to track or moderate it, with the exception of public messaging channels.

▶ **News media and fringe outlets:** Traditional media or fringe websites also amplify gendered disinformation by misrepresenting gender equality movements or feminist policy goals. Gendered disinformation often spreads on fringe websites and platforms first, to be later taken up by traditional media, a phenomenon coined ‘information laundering’<sup>16</sup>.

▶ **Right-wing conservative think tanks:** Right-wing conservative and far-right parties have been found to promote illiberal gender politics through the establishment of alternative epistemic institutions (think tanks). These promote the work of ‘alternative intellectuals’ who distance themselves from ‘the mainstream’ and inter alia spread gendered disinformation.<sup>17</sup>

<sup>13</sup> Global Engagement Center, Gendered Disinformation: Tactics, Themes and Trends by Foreign Malign Actors, U.S. Department of State, <https://t.ly/abBqE>; Edenberg, Emil. 2023. ‘Anti-Gender Politics as Discourse Coalitions: Russia’s Domestic and International Promotion of “Traditional Values”’. *Problems of Post-Communism* 70(2): 175–84.

<sup>14</sup> Women Around the World 2021, Gendered Disinformation, Democracy, and the Need for a New Digital Social Contract, Council on Foreign Relations, <https://t.ly/8hRi>.

<sup>15</sup> Agnieszka Graff and Elibieta Korolczuk 2021, *Anti-Gender Politics in the Populist Moment*. Routledge; Roman Kuhar and David Paternotte 2017, *Anti-Gender Campaigns in Europe: Mobilizing against Equality*. Rowman & Littlefield International Ltd.

<sup>16</sup> Boris Toucas 2017, *Exploring the Information-Laundering Ecosystem: The Russian Case*. Center for Strategic and International Studies (CSIS), <https://tinyurl.com/2n9w5wey>.

<sup>17</sup> Iris B. Segers 2024, ‘The Anti-Woke Academy’: Dutch Far-Right Politics of Knowledge About Gender. In: *Politics & Gender* (2024), 1-25, doi: 10.1017/S1743923X24000448.



## **6. ACCELERATED SPREAD OF GENDERED DISINFORMATION BY ARTIFICIAL INTELLIGENCE**

While gendered disinformation is not new, the proliferation of AI has dramatically increased its reach and scale. AI amplifies disinformation by accelerating the dissemination of harmful content and prioritising engagement over accuracy. AI-driven algorithms, particularly on social media platforms, are programmed to promote engaging content, often favoring inflammatory or misleading information.<sup>18</sup> For example, a 2024 study by the University of Kent and University College London found that TikTok's algorithm actively directed misogynistic content towards young people, normalising harmful attitudes toward women and LGBTQI\* individuals.<sup>19</sup>

AI-driven tools have been used to automate harassment campaigns, for example, via automated bot accounts on Social Media. This AI-boosted automation is used to amplify the volume of disinformation attacks and makes these attempts harder to counter. Additionally, with the increasing availability of largely unregulated generative AI tools, it has become possible for anyone to create misleading or manipulated content in large quantities, such as deepfakes. These AI-generated videos or images often portray individuals, particularly women in leadership, in false or compromising scenarios, with deepfakes increasingly used for image-based sexual abuse. Sexual and gender minorities, particularly those in high-profile positions, are frequent targets, leading to severe personal and professional consequences.

Overall, this apparent omission of gendered disinformation in current EU regulation approaches highlights the need for less siloed and more targeted legal and policy interventions to combat the issue effectively and account for the cross-cutting, gendered nature of disinformation.

<sup>18</sup> Stolze 2024. Digital Policy. SWP/ German Institute for International and Security Affairs (see note 3).

<sup>19</sup> UCL 2024, Social media algorithms amplify misogynistic content to teens, <https://tinyurl.com/ywukymcz>.

# 7. GENDERED DISINFORMATION AS A FORM OF ELECTION INTERFERENCE

Past elections have clearly demonstrated the ways in which gendered disinformation can be used to interfere in elections. With women candidates like Kamala Harris or Annalena Baerbock running for president or chancellor, similarities in tactics, goals and outcomes have become apparent.<sup>20</sup>

**Tactics.** The nominations of both Baerbock and Harris were confronted from the outset with sexist allegations, smear campaigns, and more negative media coverage than their male competitors, including false and distorted news stories. Harris, as a woman of colour, faced additional layers of identity-based targeted attacks, as racist and gendered disinformation narratives were blended to erode her political standing.<sup>21</sup> In addition, anti-gender and authoritarian actors exploited cultural anxieties around 'gender ideology' and family values, spreading alarmist claims about Baerbock and Harris' electoral campaigns and political values through various channels.<sup>22</sup>

**Goals.** This approach was used not only to intimidate both candidates, but ultimately to undermine the candidates' legitimacy by distorting voters' perception of their competence. Anti-gender and authoritarian actors moreover sought to contain the power of social-liberal candidates and their political agendas.

**Outcome.** Women candidates such as Baerbock and Harris were openly discredited by overt gendered disinformation. This is likely to have influenced voting behaviour. These attacks also work to silence the voices of women political candidates at large and to keep other women politicians from running for election in the future. Gendered disinformation as a form of election interference thus not only spreads misogynistic and other harmful attitudes, but also weakens public democratic discourse. It narrows the space for women and LGBTQI\* individuals to compete and hence provides for an uneven playing field. Beyond discrediting candidates, gendered disinformation can also fuel polarisation and social division.

<sup>20</sup> Nad'a Kovalčíková and Melanie Weiser 2021, "Targeting Baerbock: Gendered Disinformation in Germany's 2021 Federal Election", GMF Alliance for Securing Democracy, <https://tinyurl.com/mvzscn89>. Owen Wong 2024, "How Russian gender-based disinformation could influence the 2024 U.S. presidential election", The Conversation, <https://tinyurl.com/2hrdumkt>.

<sup>21</sup> Di Meco and Wilfore 2021, Gendered disinformation is a national security problem, Brookings.

<sup>22</sup> Phillip Ayoub and Kristina Stoeckl 2024, "The Global Fight Against LGBTI Rights: How Transnational Conservative Networks Target Sexual and Gender Minorities", NYU Press.

# 8. OVERVIEW OF EU APPROACHES

While the EU's 2020 *Gender Action Plan*<sup>23</sup> (GAP III) places human rights and empowerment, particularly for women and girls, at the forefront of the EU's external agenda; this has not translated into a sufficient commitment to counter gendered disinformation within the EU itself, nor abroad. In fact, GAP III addresses the issue of GBV but fails to account for gendered disinformation. To date, EU regulatory approaches have siloed the topic of disinformation and have neglected its cross-cutting, gendered nature and effects.

The 2022 *Digital Services Act*<sup>24</sup> (DSA) obliges very large online platforms and search engines (VLOPs) to carry out annual risk assessments related to the use of their services (DSA, Art. 34). It requires respect for human dignity and non-discrimination (Art. 34, 1.d), and highlights adverse effects related to GBV (Art. 34, 1.b). Unfortunately, the DSA fails to identify gendered disinformation as an important form of GBV. Moreover, the case-by-case examination of harmful content fails to account for the strategic and coordinated nature of gendered disinformation. Importantly, while single instances might not meet the threshold for criminal liability, gendered disinformation unfolds its harmful potential due to the sum of individual attacks and discriminatory narratives.<sup>25</sup> This is not sufficiently reflected in the required reporting structure of the DSA.

The 2023 *EU AI Act*<sup>26</sup> does not explicitly address gendered disinformation either. It provides a frame-

work for regulating AI systems, including those used to create or amplify harmful content. Under the Act, high-risk AI applications must ensure transparency, accountability, and the prevention of harm. While disinformation as a broader category is indirectly addressed through provisions on protecting fundamental rights, the AI Act lacks specific measures to tackle the unique challenges of gendered disinformation, such as its disproportionate impact on marginalised groups.

The EU's 2023 *Defence of Democracy Package*<sup>27</sup>, which aims to shed light on covert foreign influence, rightly mentions the importance of countering "anti-democratic attacks and hate speech seeking to dissuade women, LGBTQI\* persons and minority groups from being politically active." It does not, however, specify the risks posed by gendered disinformation.

The strengthened 2022 Code of Practice on Disinformation<sup>28</sup>, initiated by the European Commission, tackles the dissemination of harmful and large-scale disinformation and constitutes a comprehensive, albeit voluntary, monitoring and evaluation mechanism. While the Code of Practice contains helpful references to the importance of empowering, involving and protecting vulnerable groups via strengthening media literacy and critical thinking (p.18f), it does not highlight that marginalised groups and individuals are disproportionately affected by disinformation and lacks more forceful measures to mitigate these effects.

Overall, this apparent omission of gendered disinformation in current EU regulation approaches highlights the need for less siloed and more targeted legal and policy interventions to combat the issue effectively and account for the cross-cutting, gendered nature of disinformation.

<sup>23</sup> European Commission 2020, "Together towards a Gender Equal World", <https://tinyurl.com/5h7unvhk>.

<sup>24</sup> European Commission 2022, "Digital Services Act: EU's Landmark Rules for Online Platforms Enter into Force", [t.ly/ashtA](https://t.ly/ashtA).

<sup>25</sup> Stolze 2024. Digital Policy. SWP/ German Institute for International and Security Affairs (see note 3).

<sup>26</sup> European Commission 2024, "AI Act", press release (Brussels), <https://t.ly/j8LjB>.

<sup>27</sup> European Commission 2023, "Defence of Democracy - Commission proposes to shed light on covert foreign influence", <https://tinyurl.com/5n7pvnd7>.

<sup>28</sup> European Commission 2022, "Code of Practice on Disinformation", <https://tinyurl.com/3wudppyt>.

# 9. POLICY RECOMMENDATIONS AND FEMINIST SOLUTIONS

Gendered disinformation warrants special attention as it incites both online and offline attacks, harming individuals' participation and mental health while defaming entire groups. Effective disinformation responses must recognise the unique ways gendered disinformation targets women and marginalised groups. Feminist approaches provide critical insights into the power dynamics at play in order to develop more inclusive, equitable solutions.

**Demanding information on the spread of gendered disinformation in annual risk assessments:** Arguably, of all the regulatory measures, the DSA is the most promising tool to forcefully combat disinformation as it can hold platforms accountable when they do not mitigate harmful content. Combatting gendered disinformation is in line with three systemic risk categories as referred to in DSA Art. 34, namely that of foreseeable negative effects for the exercise of fundamental rights, in particular the fundamental rights to non-discrimination (Art. 34, 1b), that of combatting potential negative effects on civic discourse, electoral processes, and public security (Art. 34, 1c), and that of combating gender-based violence (Art. 34, 1d).

Still, the fact that gendered disinformation is not mentioned specifically arguably enables platforms to define these categories themselves. This affords flexibility to platforms concerning the degree to which they decide to counter gendered disinformation and to report on these efforts in annual risk assessments. For instance, the 2024 annual DSA risk assessment and mitigation reports of both Instagram and Facebook do not mention gendered disinformation.<sup>29</sup> Failing to explicitly highlight this risk category in the DSA thus leads to its omission. As the detrimental effect of gendered disinformation has been highlighted by key studies (see above), it is apparent that gendered disinformation poses a systemic risk within the scope of the DSA. The Commission should therefore demand from platforms to include gendered disinformation in their risk assessments. This is of paramount importance to countering its spread.

<sup>29</sup> Meta 2024, Regulation (EU) 2022/2065 Digital Services Act (DSA). Systemic Risk Assessment and Mitigation Report for Facebook, <https://tinyurl.com/2s4h83f9>; Systemic Risk Assessment and Mitigation Report for Instagram, <https://tinyurl.com/bddy5x4>.

In addition, the following steps are needed to combat gendered disinformation online:

▶ **Beyond case-by-case evaluations:** Gendered disinformation presents a systemic risk. Evaluating gendered disinformation on a case-by-case basis is insufficient, as individual instances may not meet the threshold for criminal liability. Only the cumulative impact reveals and amplifies the harm when viewed collectively.

▶ **Inclusive AI development:** Feminist perspectives should be included in the development and regulation of AI systems to avoid embedding gender bias in algorithms and ensure that AI tools promote gender equity.

▶ **Tech regulation and transparency:** Policymakers should advocate for greater transparency and accountability from tech companies, ensuring that AI algorithms are subject to scrutiny to prevent bias and the amplification of disinformation. The discontinuation of tools such as CrowdTangle is an unwelcome development, detrimental to the public interest. Global cooperation and multi-stakeholder approaches: Tech companies must collaborate with governments, international organisations, and feminist civil society to address the transnational nature of gendered disinformation, combining efforts to protect electoral integrity and democratic participation.

▶ **Support for women and sexual and gender minorities in public life:** Legal protections and mental health resources should be available for women in public life, particularly those targeted by gendered disinformation, to safeguard their participation in politics and public discourse.

▶ **Increased funding for research:** Policy makers should increase funding for research on the impact of gendered disinformation and gender based violence to add to the understanding of the phenomenon and develop more targeted approaches to respond to its causes and effects.

These recommendations should be integrated in several of the upcoming policy initiatives of the Commission<sup>30</sup>. With the Gender Equality Strategy, the Gender Action Plan (GAP III) and the European Internal Security Strategy all running out in 2025, the Commission has an opportunity to ensure the inclusion of sufficient measures to tackle gendered disinformation in the revised iterations. The important aim of the initiative European Democracy Shield to ensure integrity of electoral processes and the safety of election candidates, particularly women, must translate into a distinct focus on tools to combat gendered disinformation. Planned initiatives such as the Action Plan on Cyberbullying, or the Roadmap on the Future of Digital Education and Training should all call for efforts to address gendered disinformation.

<sup>30</sup> EU Matrix 2025, Upcoming policy initiatives, <https://tinyurl.com/4mep6ar4>.

## **10. CONCLUSION**

Gendered disinformation, particularly when amplified by algorithms online, poses a serious threat to democracy, gender equality, and human rights. Addressing this issue requires the integration of feminist perspectives into policy responses, to ensure that the unique harms faced by women and marginalised groups are effectively addressed. The urgency of this issue calls for coordinated action, transparency from tech platforms, and the improvement and compliance with policies like the DSA to protect democratic processes and support marginalised voices. It is of paramount importance that the EU does not water down but rather strengthens its regulatory approaches, particularly in the face of potential protectionism of big tech by the new US administration under Donald Trump. In doing so, the EU will be able to take important strides towards fulfilling its commitments to gender equality, the prevention of gender-based violence, and the protection of democratic integrity.

