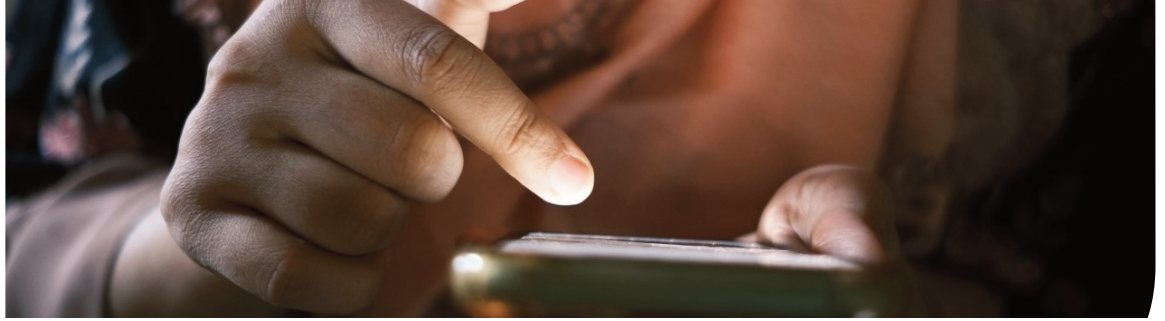




SECURING DIGITAL BORDERS: CONFRONTING TECHNOLOGY-FACILITATED VIOLENCE AGAINST MIGRANT WOMEN IN THE EURO-MEDITERRANEAN

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Executive Summary

Technology-Facilitated Gender-Based Violence (TFGBV) exposes migrant women in the Euro-Mediterranean region to new forms of exploitation and control. Despite the growing digitalisation of migration processes, European Union (EU) policy frameworks have failed to provide consistent protection for vulnerable groups, such as migrant women.

Key findings

- EU legislation addressing gender-based and digital violence remains fragmented, leaving gaps in protection for migrant women without stable residence status.
- Structural vulnerability is motivated by interrelated factors such as limited digital literacy, precarious legal standing, language barriers, and social isolation.
- Current policy frameworks are gender-neutral or migration-blind, weakening enforcement and accessibility.

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Key recommendations

1. Adopt a comprehensive EU legal instrument addressing TFGBV, explicitly protecting vulnerable groups such as migrant women and integrating residence rights for victims.
2. Ensure multilingual and accessible reporting mechanisms across member states to reduce linguistic and bureaucratic barriers.
3. Enhance cross-border cooperation among EU enforcement bodies through Europol and shared evidence systems.
4. Mandate stronger platform accountability, including multilingual moderation and transparent reporting on gendered abuse.
5. Establish EU-wide disaggregated data collection via the European Institute for Gender Equality (EIGE) to monitor intersections of gender, race, and migration status.
6. Integrate TFGBV prevention into EU external and migration policies, prioritising gender-sensitive and digital safety components in EU-Middle East and North Africa (MENA) cooperation.

Mobile phones and the Internet represent lifelines for migrants during and after their travel (Unwin, 2022). As digital tools increasingly shape access to information and community ties, migrant women in the Euro-Mediterranean region face growing exposure to Technology-Facilitated Gender-Based Violence (TFGBV). Not only does this type of violence reflect how digital technologies and platforms exacerbate existing patterns of gendered violence, but it also introduces new forms of abuse. TFGBV is defined by the United Nations Population Fund (UNFPA) as “*an act of violence perpetrated by one or more individuals that is committed, assisted, aggravated and amplified in part or fully by the use of information and communication technologies or digital media, against a person on the basis of their gender*” (Vaughan et al., 2023). It can manifest itself in various forms, including digital surveillance by traffickers, online harassment, scouting of potential victims of forced marriages, and exploitation via messaging platforms.

The phenomenon is entrenched in the continuum of violence that extends into physical, sexual, and psychological violence, and while the means are digital, the root causes are inextricable from the discrimination and structural violence that migrants face continuously in their journeys and settlement. While studies indicate that up to 90% of women and girls migrating along Mediterranean routes from North Africa have experienced rape at some point during their journeys (MOAS, 2024), and despite rising concern over digital safety, there remains a critical gap in EU-Middle East and North Africa (MENA) cooperation on how TFGBV disproportionately affects vulnerable groups such as migrant women.

How digital violence disproportionately impacts migrant women

Gendered violence on technology platforms within migrant communities is critically underreported and understudied: in the EU, comprehensive statistical data is not available, thus making the analysis of the issue much more complicated. Previous studies already demonstrate that TFGBV disproportionately affects women with identity markers that intersect with systemic barriers, such

as displacement status, language, race, and sexual orientation. Even beyond the EU, the pattern is clear: for example, a study in Uganda has shown that 75% of refugee women, compared to 33% of women overall, have reported facing online violence, such as stalking and sexual harassment (GBV AoR, 2023). The disparity likely reflects not only greater exposure to risk but also differences in digital access, reporting mechanisms, and social vulnerability. Given documented patterns of TFGBV among displaced women, it is plausible that migrant women crossing Mediterranean routes experience similar abuse and violence, both in travel and once they are settled.

The reasons why refugee and migrant women are disproportionately affected by this phenomenon can be summarised within four interrelated macro-factors (Oh & Anand, 2024):

1. **Lower digital literacy and general education:** women with reduced digital literacy may not know how to identify TFGBV, and, at the same time, traffickers often exploit this by creating deceptive digital environments, such as job advertisements, modelling agencies or support offers. With a lower digital literacy, migrant women may rely on third parties to access online services, find work or communicate with authorities, thus creating asymmetric power dynamics that lead to control or manipulation.
2. **More vulnerable legal status:** not only can their status be leveraged against them by perpetrators, threatening them with deportation, but also the increased need for means to sustain their legal status in host countries can force them to accept and use risky online channels. At the same time, the EU still lacks a harmonised legal framework granting residence rights to migrant women who are victims of gender-based violence, including its digital forms, leaving their protection dependent on national legislation. For example, while the 2022 Directive on combating violence against women and domestic violence marks progress, it does not ensure residency protection for migrant victims.
3. **Language barriers:** many displaced women face immense language barriers as they have to seek assistance and opportunities in digital spaces of which they do not speak the language. For example, Italian digital platforms for social security, healthcare registration and legal assistance are often available only in Italian, which constitutes a substantial obstacle for migrants that have just settled in Italy and that are completely unfamiliar with the language. Even in countries that have the possibility of translating official government pages in other languages, limited language coverage can still hinder access to reliable information and assistance, increasing the risk of unsafe or exploitative situations for non-English speakers.
4. **Social isolation:** the trauma of displacement can have long lasting effects for women, who are forced to live in often limited social networks in a new environment, further restricting access to support and resources.

Taken together, these factors underscore the need for EU digital governance and migration frameworks to adopt intersectional protection mechanisms, ensuring that digital literacy, language accessibility, and legal safeguards are systematically integrated into victim-support and border-management policies. The intertwining of these factors has been particularly evident in the case of externally and internally displaced Ukrainian women since the start of the Russian invasion in 2022. As a significant number of men were conscripted or remained to fight, many women were forced to flee alone or with children, which heightened their exposure to online harassment. Perpetrators have exploited this vulnerability through social media platforms such as Telegram and Facebook, luring

women into exploitation and human trafficking via deceptive offers of employment, accommodation or transportation. Digital platforms thus operate as double-edged spaces, providing crucial channels of support and information for displaced women, while simultaneously exposing them to manipulation and abuse. Since refugee support for Ukrainian nationals has become increasingly present online with the creation of networks and websites, recognising suspicious and dangerous posts and accounts is progressively challenging. Many women feel especially vulnerable seeking housing and jobs, but financial insecurity forces them to use risky online channels (Pertek et al., 2022).

Testimonies collected during interviews provide crucial context in absence of statistics. During an interview, a nurse¹ working in the gynaecology department of a hospital close to Milan shared accounts of several women that were receiving care there. They had arrived in Italy after accepting online job offers, turning out to be deceptive and false, as, upon arrival, they were coerced into prostitution. This perfectly describes how digital deception can serve as a gateway into exploitation and trafficking. In another interview, a spokesperson² from an Italian non-governmental organisation (NGO) working for the smooth integration of migrants in Italy described how, in several communities across Italy, men who had migrated years earlier initiated marriage arrangements via video calls with women in their countries of origin. Once the women arrive, they often find themselves isolated, as well as dependent on their new and unknown husbands for legal and financial status, therefore exposed to various forms of control and abuse. These examples illustrate how digital practices can reproduce and reinforce patriarchal control within migration contexts, as technologies meant to facilitate connection or mobility are repurposed to sustain gendered hierarchies and dependence.

The legislative patchwork: gaps and inconsistencies

Despite recent progress, currently the EU does not have a comprehensive legal framework protecting migrant women from TFGBV. A patchwork of legislative instruments, covering various fields such as gender-based violence, migration, data protection and digital governance offers only partial security for victims of these crimes. Their fragmented nature, however, result in uneven protection across member states, creating structural problems. This section gives an outline of the main EU legislative instruments currently relevant to this area.

A. Instruments directly targeting Technology Facilitated Gender-Based Violence

1. Directive 2024/1712 amending Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims (European Union, 2024b). The Directive explicitly mentions crimes committed “*with the use of information and communication technologies*” and reaffirms granting assistance irrespective of nationality. Most importantly, it states that victims of trafficking “*have the right to apply for international protection or equivalent national status*” and “*to benefit from a residence permit.*” While the scope is exceptionally wide for this type of legislation, the Directive only covers victims of trafficking, leaving exposed women who suffered from abuse and other gender-based violence.

¹ Anonymous interviewee, personal communication, 15 May 2025.

² Anonymous interviewee, personal communication, 5 October 2025.

2. Directive 2024/1385 on combating violence against women and domestic violence (European Union, 2024a). By introducing standardised measures across member states, the legislative instrument covers a wide range of forms of abuse, including digital violence. Its most relevant factor is the recognition by the text that violence against women stems from “*historically unequal power relations*,” framing it as a structural issue requiring systemic change. The Directive, however, falls short when considering migrant women: by prioritising “*national security*,” it introduces exceptions that allow authorities to share victims’ personal data with immigration or law enforcement bodies, which can deter undocumented or precarious-status women from seeking help. This reflects not only a legal loophole but a political choice to privilege border control over victim protection. Finally, the Directive does not automatically grant the victim an autonomous residence permit, which remains at the discretion of member states, posing a serious issue for abused women who do not have a permanent permit or the means to obtain one. This shortcoming underscores the need for future legislative action, and in particular for the introduction of a binding provision that guarantees autonomous residence permits in all gender-based violence cases, alongside explicit data-protection firewalls to prevent the disclosure of victims’ personal information to immigration authorities.

B. Instruments indirectly relevant to Technology-Facilitated Gender-Based Violence

1. Regulation (EU) 2016/679 “General Data Protection Regulation (GDPR)” (European Union, 2016). While the most comprehensive framework for the protection of personal data and privacy applies to all individuals within the EU without discrimination, and provides essential legal instruments against TFGBV, its effectiveness is extremely limited by accessibility and enforcement gaps. With this tool, the recognition of critical rights such as the right to be forgotten and data minimisation is certified by the law, and victims can restrict the circulation of abusive content. Many migrants, however, lack awareness of their rights, linguistic competences or the ability to file complaints to Data Protection Authorities, with increased risks for undocumented migrants. Moreover, the Regulation allows exceptions for national security, public order, and immigration control, which can override privacy safeguards and enable authorities to access or share personal data, potentially deterring victims from seeking protection. While some NGOs and legal aid organisations attempt to assist migrants in these procedures, such support remains fragmented and under-resourced, leaving most victims without effective means to exercise their rights.
2. Regulation (EU) 2022/2065 “Digital Services Act (DSA)” (European Union, 2022). With the requirement to prevent and mitigate systemic risks for platforms, the DSA addresses TFGBV, such as online harassment, image-based abuse, and gendered hate speech. In particular, the Regulation enforces notice-and-action mechanisms for the removal of illegal content, transparency obligations regarding algorithms and moderation practices, and access to data for researchers, which can expose patterns of abuse targeting migrant women. The DSA remains, however, gender and migration neutral, without recognising any specific protection for marginalised groups. Another issue is the strong reliance for implementation on national Digital Services Coordinators, whose resources and expertise vary, perpetrating an unequal treatment across the EU.
3. Directive 2012/29/EU establishing minimum standards on the rights, support and protection of victims of crime (European Union, 2012). While it was adopted before the recognition of

TFGBV, it remains a fundamental instrument for victim support mechanisms, ensuring victims' access to information, assistance, protection measures, and participation in criminal proceedings. However, the Directive does not explicitly address online or technology-facilitated violence, with services often missing language accessibility or trauma-informed training. Its nature of a Directive implies uneven implementation across member states, and its procedural character, rather than substantive, can mean that migrant women with irregular status may fear contacting authorities. In practice, this means the Directive focuses on victims' rights during legal proceedings, such as access to information and participation in court, but does not confer broader material protections, for instance residence rights or safeguards against deportation, leaving significant gaps in protection for migrant victims.

Beyond binding legislation, two recent major policy initiatives have shaped the EU's broader approach to countries on the other side of the Mediterranean, and will hopefully provide the groundwork to the future response to TFGBV on migrant women. First of all, the *Pact on Migration and Asylum*, adopted in 2024, introduces comprehensive reforms to asylum and border control, such as the employment of biometric data and digital screening for migrants. While efficiency is increased by these reforms, they also raise a number of concerns over privacy, data protection and their potential misuse against vulnerable groups, such as women. Similarly, the *Pact for the Mediterranean* wishes to redefine cooperation with southern partners, by fostering regional coordination on migration, trade, and digital regulation. While, in principle, this framework could encourage cross-border collaboration against digital violence against women, the initiative remains much more security-driven and completely lacking explicit references to TFGBV. The absence of gender specific language or the mentioning of digital abuse poses, however, a crucial problem for future conversations around the protection of migrant women and reinforces the need for a specific legislative instrument.

Gaps in the current legislative framework

Based on the previously described EU legislative instruments, a number of gaps can be highlighted:

- a. Critical enforcement and accessibility gaps: current directives do not consider accessibility needs that vulnerable groups such as migrant women possess. Language barriers, lack of digital literacy and fear of authorities cause formal rights to turn into just symbols, reproducing structural inequalities and systematically excluding migrant women from justice mechanisms.
- b. Absence of intersectionality: gender, migration status and technology are always treated separately in each legislative instrument, and in this way the law fails to capture how these three categories reinforce themselves in real life. Moreover, it fragments responsibility across policy domains, falling within jurisdictions and thus making it more complicated to hold the perpetrators responsible. Finally, it drastically weakens prevention, with responses becoming one dimensional and the policy targeting symptoms, not established systems such as those operating TFGBV.
- c. Limited cross-border cooperation: digital abuse crosses state borders, often occurring across jurisdictions, but as criminal enforcement remains primarily national, many of these offences fall into a jurisdictional void. The absence of cooperation between member states' enforcement bodies, data authorities and courts also reduces deterrence and increases impunity for

offenders, especially for offenders who can anonymise their location. Its procedural complexity can also have a direct impact on victims' willingness to report their experience, which can be further exacerbated by its already mentioned accessibility gaps.

- d. Platform accountability: as there currently is no common EU standard for platforms' terms of service, each company is free to define and enforce its own rules on TFGBV, resulting in very uneven protection across platforms and reliance on self-regulation. This is the case of internal moderation policies and algorithms that detect harmful content, normally calibrated on corporate interests in engagement, rather than commitments on human safety, especially for marginalised groups such as migrant women. Moreover, these types of instruments often fail to capture abuse expressed in non-European languages or dialects, including coded forms such as slang, euphemisms, or culturally specific terms used to conceal racist or misogynist intent. Finally, while the DSA begins to impose accountability, enforcement still depends on member states' national authorities, not on cross-border cooperation.
- e. No data collection: the absence of EU-wide data collection makes the phenomenon statistically invisible, prevents evidence-based policy-making and obscures intersectional patterns of violence. Moreover, it also perpetuates underfunding and policy neglect, as it falls outside of budgetary and political priorities.

Taken together, these legislative and structural shortcomings do not operate in isolation but reinforce one another, with limited accessibility amplifying enforcement failures, weak cross-border coordination compounding platform impunity, and the absence of data concealing the very patterns policy-makers need to address. This convergence creates a systemic cycle of invisibility and exclusion, where migrant women's digital vulnerability is reproduced across legal, institutional, and technological levels. The underlining issue is the lack of a specific legal instrument that can protect not only migrant women but all women within the EU from TFGBV, and that ensures increased protection for vulnerable groups such as migrants or underrepresented minorities. More specifically, the instruments require gender and platform sensitive language, which can guarantee intersectionality as well.

Conclusion and recommendations

The previous analysis and the highlighted shortcomings clearly indicate the need to move beyond fragmented protection and towards a more integrated and intersectional strategy. From this paper, the following recommendations outline measures able to strengthen protection against TFGBV, particularly for vulnerable groups such as migrant women.

1. Establish EU-wide and disaggregated data collection: the European Institute for Gender Equality (EIGE) should be tasked with developing indicators that capture the overlapping dimensions of gender, race, and migration status in online abuse in order to monitor these types of violence. The resulting dataset should feed into the European Commission's annual Gender Equality Report and inform the programming of EU funding instruments, such as the Citizens, Equality, Rights and Values Programme (CERV) and the Asylum, Migration and Integration Fund (AMIF) to ensure that emerging patterns of TFGBV directly influence legislative reviews, resource allocation, and policy priorities at the EU level.
2. Adopt EU legislative instrument on the protection of vulnerable groups against TFGBV: with the introduction of a comprehensive legislative instrument on digital and cross-border abuse, extending the scope of current Directives such as Directive 2024/1385, criminalising key forms of online violence such as cyberstalking and online extortion, and mirroring the safeguards already foreseen for trafficking victims. Given the direct applicability of a Regulation, it would be advisable for the instrument to be

such, instead of a Directive. The need to include TFGBV as legal grounds for asylum and permanent residence in EU member states is also essential.

3. Strengthen enforcement, accessibility, and victim support: multilingual and accessible reporting mechanisms should be available across member states, including but not limited to digital complaints forms and data protection requests in a standardised form across the entire EU, thus guaranteeing continuity across borders. This could be operationalised through a centralised EU-wide online portal, hosted by an existing body such as the European Union Agency for Fundamental Rights (FRA) or the European Institute for Gender Equality (EIGE), to collect reports, provide translation support, and connect victims with national authorities and NGOs.
4. Increase cross-border cooperation and investigative capacity: the EU should strengthen judicial and law enforcement cooperation through Europol, facilitating evidence-sharing and supporting victims across borders. This could be achieved by expanding the mandate and resources of existing mechanisms such as the European Cybercrime Centre (EC3) within Europol. Dedicated TFGBV focal points within these bodies could ensure that cases involving online gender-based violence and migrant victims receive consistent attention and follow-up.
5. Improve platform accountability and transparency: platforms should be mandated to employ multilingual moderation teams and collaborate with NGOs experienced in assisting migrant women. Transparency reports should include data on online gendered abuse and be subject to independent review by national authorities and civil society experts. Additionally, platforms should be required to conduct periodic risk assessments, also aligned with the DSA's systemic risk obligations, to identify and mitigate gendered and migration-related vulnerabilities before abuse occurs.
6. Integrate TFGBV into external and migration policies: the external dimension of the *Pact on Migration and Asylum* and the *Pact for the Mediterranean* should explicitly include digital safety and gender equality objectives. EU-MENA cooperation programmes should prioritise capacity-building for law enforcement, digital security training for migrant women, and the creation of secure online platforms for verified employment and housing opportunities. To operationalise this, existing EU instruments such as Europol's Secure Information Exchange Network Application (SIENA) and Joint Investigation Teams (JITs) could be leveraged to facilitate real-time information sharing and coordinated investigations of cross-border digital abuse, ensuring that TFGBV cases are treated with the same urgency as other forms of organised crime.

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