

# **WSIS+20 STAKEHOLDER CONSULTATIONS: GENDER DIGITAL COALITION INPUTS TO THE ELEMENTS PAPER**



These comments on the WSIS+20 review Elements Paper were submitted by the Gender Digital Coalition, a coalition of civil society organisations comprising the Alliance for Universal Digital Rights, the Association for Progressive Communications, Derechos Digitales, Equality Now, IT for Change and Women at the Table.

## **1. WHAT ARE THE MOST IMPORTANT ACHIEVEMENTS ARISING FROM THE WORLD SUMMIT ON THE INFORMATION SOCIETY (WSIS) THAT SHOULD BE HIGHLIGHTED IN THE ZERO DRAFT?**

The Gender Digital Coalition endorses the vision and commitment presented in the Elements Paper “to build a people-centred, inclusive and development-oriented Information Society” in which “everyone can create, access, utilise and share information and knowledge, enabling individuals, communities and peoples to achieve their full potential in promoting their sustainable development and improving their quality of life.” Surely, this approach can be realised only by creating the structural conditions for advancing gender equality, which has the equitable participation of all women, LGBTQIA+ persons and other structurally marginalised communities in shaping the future of the global digital economy and knowledge society at its centre. This could only be achieved through public financing and democratic digital governance models based on the digital multistakeholderist principles that effectively address economic and political concentration of digital power.

There is a critical need for strategic policy focus on ensuring meaningful connectivity – which includes addressing affordability, digital literacy, relevant content, safety online, and overcoming structural challenges to women’s and LGBTQIA+ persons’ participation in the digital economy and society. This holistic approach has been particularly important for individuals who face multidimensional barriers to their participation, while much more needs to be done to integrate this agenda into national digital economy roadmaps through effective strategies for addressing intersectional digital inequalities, including gender-based violence and exclusion.

The establishment of the Internet Governance Forum (IGF) and its successful execution over the last 20 years, and its regional and national iterations, represents a crucial achievement in creating a space for ongoing multistakeholder dialogue on the expanding scope of internet-related public policy issues, and their

intersections with the gender equality agenda. It has provided a platform for raising critical issues that affect women and LGBTQIA+ persons such as the gender digital divide, rising technology-facilitated gender-based violence (TFGBV), gender discrimination in data and artificial intelligence (AI) systems, sex-disaggregated information and communications technology (ICT) data, and the need for intersectional approaches to digital rights.

At the same time, these dialogues have limitations regarding their impact on public policy in any of these areas due to the lack of a dedicated action line and associated mechanisms to further continuous progress on the gender equality bottom line. Taking these considerations on board, the Zero Draft must devote attention to addressing the gender dimensions of legacy and emerging internet-related public policy issues in each of its mechanisms, and identify how gender must be effectively mainstreamed in the integrated implementation of WSIS, the Global Digital Compact and the Beijing process.

## **2. WHAT ARE THE MOST IMPORTANT CHALLENGES TO THE ACHIEVEMENT OF WSIS OUTCOMES TO DATE AND IN THE FUTURE THAT NEED TO BE ADDRESSED IN THE ZERO DRAFT?**

We highlight the following challenges that the Zero Draft needs to address:

### **2.1. LACK OF A SYSTEMIC GENDER PERSPECTIVE**

The persistent lack of gender mainstreaming across WSIS Action Lines remains a major obstacle. Structural inequalities rooted in gender, race, class and geography continue to shape digital exclusion, especially in the Global South. Women remain significantly less likely than men to access mobile phones and digital infrastructure, with emerging technologies like AI set to deepen these divides.

In the absence of a dedicated action line on gender equality, it is critical to institute a gender-specific action agenda, targets, accountability mechanisms and

indicators for each of the Action Lines. Introducing this gender perspective effectively in the WSIS monitoring and implementation follow-up, and integrating this appropriately with the data and AI governance mechanisms of the Global Digital Compact, is a core challenge.

## **2.2. ADDRESSING TFGBV THROUGH COMPREHENSIVE, RIGHTS-BASED FRAMEWORKS**

Despite increasing recognition from international human rights mechanisms that TFGBV exists in a continuum linking online and offline harms, significant gaps remain between global commitments and national implementation. State responses rely on cybercrime laws or criminal justice measures that depend on vague definitions, and risk undermining international law principles of legality, necessity and proportionality. Most of these legal frameworks lack gender perspectives on structural inequalities that shape online violence. In some cases, they have led to disproportionate censorship, surveillance or the penalisation of those seeking protection.

Addressing TFGBV requires a shift from punitive responses to comprehensive, rights-based strategies grounded in accountability. To close this gap, WSIS Action Lines must embed gender, not just in access, but also digital safety, legal protection and governance, ensuring that women and gender-diverse people can meaningfully and safely participate in the digital ecosystem.

## **2.3. LACK OF CORPORATE ACCOUNTABILITY FOR HUMAN RIGHTS VIOLATIONS, INCLUDING THOSE BASED ON GENDER**

The protection and promotion of the civic, political, economic, social and cultural rights of women and LGBTQIA+ persons face growing challenges within the digital public sphere and transnational data and AI value chains. These challenges are particularly serious in the Global South, where regulatory and enforcement capacities are often limited. Despite their far-reaching influence, transnational technology corporations remain largely unaccountable for human rights violations – particularly those of a gendered nature – facilitated through their platforms and data infrastructures. This persistent global digital governance

gap highlights the urgent need for compliance with the UN Guiding Principles on Business and Human Rights to ensure corporate accountability, safeguard the rights of marginalised communities – particularly the rights to privacy, expression, security and participation – in digital environments, and uphold gender equality.

## **2.4. DIGITAL COLONIALISM THROUGH EMERGING TECHNOLOGIES**

Looking towards the future, the concentration of artificial intelligence development in a few Global North countries and corporations threatens to create new forms of digital colonialism that embed existing inequalities into the foundational technologies. The challenge lies in achieving urgent action to democratise AI governance, ensure equitable access to computational resources, and mandate gender impact assessments for emerging technologies. Failure to address this challenge makes WSIS risk becoming complicit in creating a digital future that further marginalises women and Global South communities.

## **3. WHAT ARE THE MOST IMPORTANT PRIORITIES FOR ACTION TO ACHIEVE THE WSIS VISION OF A “PEOPLE-CENTRED, INCLUSIVE AND DEVELOPMENT-ORIENTED INFORMATION SOCIETY” IN THE FUTURE, TAKING INTO ACCOUNT EMERGING TRENDS?**

### **PRIORITY 1: WSIS ACTION LINE ON GENDER**

The establishment of a standalone WSIS Action Line on gender, as advocated in our [collective statement on gender in the WSIS+20 review process](#), is the most urgent priority for achieving the WSIS vision. This action line would offer a clear framework for addressing gender inequality in digital development, with defined goals, measurable targets and dedicated resources. Without structural transformation, gender equality efforts will continue to fall short in dismantling

systemic barriers that hinder historically marginalised populations from meaningful participation. It should include obligations on access to data, gender-specific indicators and targets, mandatory gender impact assessments, increased representation, dedicated funding, and the adoption of a comprehensive approach to TFGBV.

## PRIORITY 2. EFFECTIVE GENDER MAINSTREAMING IN THE ACTION LINES

In the Action Lines, institute a new Action Line on gender equality in the digital society to guide transversal integration across WSIS. Priorities include:

- **Action Line C1:** Gender-responsive standard setting for digital public goods and public infrastructure.
- **Action Line C2:** Universal access to meaningful connectivity for all women and girls through effective use of gender budgeting strategies in universal service and access funds (e.g. inclusive access, broadband plans, STEM quotas).
- **Action Line C10:** Intersectional benchmarks on digital human rights, and due diligence guidance for transnational corporations and other business enterprises on women's human rights and ecological sustainability in digital value chains.
- **Action Line C11:** Removing barriers to international cooperation on data and AI, including restrictive intellectual property regimes, digital trade clauses and unequal access to computing power, is essential to enable feminist digital economies and public investment in care and collective well-being.

## PRIORITY 3. EFFECTIVE GENDER-BASED INCLUSION IN DIGITAL GOVERNANCE SPACES

Effective inclusion must go beyond representation. It demands sustained resourcing, capacity and structural change. Actions include:

- Establishing dedicated funding streams for multistakeholder participation, including core funding to women's rights organisations.
- Ensuring 50% women's representation across all WSIS governance and technical bodies.

- Establishing funding streams for gender-inclusive ICT programmes.
- Applying feminist facilitation methods to counterbalance power asymmetries.
- Tracking metrics beyond headcounts: measure influence, agenda-setting power, and access to speaking roles.
- Developing multilingual, inclusive tools and mentorships to support women's leadership in digital policy dialogues.

#### **PRIORITY 4. MANDATORY GENDER-BASED ASSESSMENTS IN TECHNOLOGY FORESIGHT OF DATA AND AI SYSTEMS**

Mandatory gender impact assessments must be required for all ICT policies and emerging technologies, specially AI systems, to prevent reinforcing existing gender biases. As AI is increasingly integrated in decision-making systems across sectors, the underrepresentation of women in AI development leads to products and services that inadequately meet the needs of half the population. These assessments must be conducted pre-deployment, and include intersectional analysis across race, class, geography, disability and other forms of marginalisation.

The WSIS+20 process must recognise the implications of digital labour and AI-driven economies on marginalised populations. A feminist approach to digital economies is crucial for recognising unpaid care work, and promoting equitable participation in digital innovation.

#### **PRIORITY 5: PUBLIC FINANCING FOR MEANINGFUL AND AFFORDABLE ACCESS**

Meaningful internet access today means enabling women, LGBTQIA+ people and other marginalised groups to fully benefit from digital opportunities, not just be connected. This requires gender-responsive public access points, subsidised broadband, digital literacy, support for women-led MSMEs to adopt digital tools, gender-inclusive public infrastructure development, and STEM scholarships for women and people of diverse genders and sexualities. These efforts must be backed by gender budgeting in universal service and access funds, with strong monitoring to ensure equitable use, especially in the Global South.



## **4. WHAT ADDITIONAL THEMES/ISSUES, IF ANY, SHOULD BE INCLUDED IN THE ELEMENTS PAPER?**

The following additional themes must be included to ensure that the WSIS+20 process responds to current global realities:

### **4.1. CORPORATE POWER AND ACCOUNTABILITY IN THE DIGITAL AGE**

The Elements Paper should explicitly recognise the growing concentration of power among dominant technology companies that evade accountability for enabling multiple forms of violence. These harms rooted in business models must be addressed as a distinct theme, separate from general cybersecurity. The influence of large platforms over infrastructure, data governance and algorithmic systems decision making demands compliance with international law, liability mechanisms, and stronger public oversight.

### **4.2. GAPS IN CORPORATE LIABILITY AND BUSINESS AND HUMAN RIGHTS FRAMEWORKS**

The Elements Paper should explicitly recognise the UN Guiding Principles on Business and Human Rights, and call for stronger corporate accountability. States should be reminded of their duty to protect against human rights abuses by digital technology corporations in global value chains and to ensure effective implementation of OHCHR guidance (A/HRC/50/56). Platforms must be held accountable not only for content moderation, but also for structural design choices, such as algorithms and default settings, that contribute to online harms, including TFGBV. A rights-based, safety-by-design approach with mandatory audits, risk assessments and disaggregated reporting is essential. Voluntary measures are inadequate and shift the burden onto those most affected. Embedding enforceable standards into the WSIS agenda is essential to ensure a safe and equitable environment.

### **4.3. DIGITAL ECONOMY AND LABOUR JUSTICE**

The digital economy must be addressed through a justice-oriented lens. Issues such as precarious digital labour, lack of social protections for platform workers, and the invisibilised burden of unpaid work call for guarantees to ensure that the internationally recognised labour rights are applied equally to work on digital platforms.

### **4.4. DIGITAL COLONIALISM AND DATA SOVEREIGNTY**

The framework must acknowledge how digital infrastructures reinforce colonial power dynamics, and extract value from the Global South. Data extraction, algorithmic bias, and the concentration of digital infrastructure in Global North corporations create new forms of dependency that mirror historical colonial relationships. Digital sovereignty requires not just access to technology, but community ownership and control over data and the means of digital production. The response must promote feminist and decolonial approaches to data governance, recognising the harms of extractive data practices and advancing models based on collective rights, community stewardship and public value.

### **4.5 COMMUNITY OWNERSHIP AND DIGITAL PUBLIC INFRASTRUCTURE**

Investment in public interest technology and digital public infrastructure is critical, including support for community networks, open-source tools, and digital public goods that serve education, health and local development goals that are core to WSIS's vision of the information society.

### **4.6. GENDER REPRESENTATION IN DIGITAL GOVERNANCE**

The Elements Paper must also include a specific section on women's representation in digital governance and decision-making bodies, addressing the stark underrepresentation of women. It should call for concrete targets to increase women's participation in WSIS-related governance structures and mandate gender-sensi-

tive protections within national cybersecurity policies, recognising that current male-dominated structures perpetuate policies that fail to address gendered digital threats.

#### **4.7. CLIMATE CHANGE AND THE ICT LIFE-CYCLE**

The Elements Paper should explicitly address state obligations to combat climate change across the ICT production chain, whose unequal environmental footprint disproportionately affects countries in the Global South and marginalised groups including women, LGBTQIA+ people, children, Indigenous populations and the elderly. Recent advisory opinions by the Inter-American Court of Human Rights and the International Court of Justice reaffirm states' duties to uphold human rights in climate action.

### **5. DO YOU WISH TO COMMENT ON PARTICULAR THEMES/ISSUES/PARAGRAPHS IN THE ELEMENTS PAPER?**

- We welcome the recognition in paragraph 9 that “the empowerment of women and girls, and their participation in the digital space are essential to close the gender digital divide and advance sustainable development.” However, this acknowledgment remains insufficient without concrete mechanisms for implementation. We strongly recommend establishing a dedicated and standalone WSIS Action Line on gender to provide a structured, accountable and adequately resourced mechanism for addressing gender inequality in the digital sphere. Without such an action line, efforts to promote digital inclusion risk overlooking the systemic barriers that continue to exclude women and gender-diverse people from fully participating in and shaping the digital society.
- Paragraph 45 correctly identifies women’s underrepresentation in digital spaces and the ICT sector, and their disproportionate experience of online harms. To address these systemic inequalities, we urge the inclusion of adequate solutions, including mandatory gender impact assessments for ICT policy making and AI deployment, dedicated funding for gender-inclusive ICT

programmes, and clear targets to increase women's representation in WSIS-related governance bodies, where women currently hold only 26% of leadership roles.

- While the issue of TFGBV is currently embedded within broader cybersecurity or safety concerns, we recommend recognising this violence as a human rights violation and as a standalone issue, particularly in the context of emerging technologies like generative AI. The proliferation of deepfakes, surveillance tools and coordinated disinformation campaigns has created new forms of online harm that require specific responses grounded in human rights and accountability. Responses must adopt a balanced approach grounded in the principles of legality, necessity and proportionality, while centring the rights and experiences of victims/survivors. Rather than relying solely on punitive measures, strategies should be multifaceted and incorporate non-legal responses aimed at addressing structural inequalities and preventing harm.
- The discussion of artificial intelligence in paragraphs 70-76 inadequately addresses the gendered implications of AI development and deployment. While paragraph 72 mentions concerns about digital divides in AI governance between developed and developing countries, there is a need to acknowledge that women comprise less than 15% of authors of influential AI research papers. Gender impact assessments must be mandatory for AI systems before deployment, to ensure that AI governance frameworks include robust gender analysis and women's meaningful participation in decision-making processes.
- In its discussions on data and AI governance, the paper must devote attention to underscoring the interconnections between the policy sovereignty of developing countries to build their home-grown data and AI governance pathways – through a “data flows for equitable development” approach and a balanced strategy to intellectual property rights in AI, which supports innovation and public interest effectively – in order to set up gender-just digital economies in the Global South.
- The Elements Paper should more directly recognise the concentration of power in the hands of a few dominant technology platforms that shape infrastructure, public discourse and data governance. We recommend stronger language on the need for binding accountability frameworks for the private sector, including mechanisms for transparency, independent algorithmic oversight, and redress.
- These comments are intended to support the strengthening of the Elements Paper so that it reflects the evolving digital landscape, centres rights-based ap-

proaches, and ensures meaningful inclusion of historically marginalised groups and regions. In light of the numerous international instruments that acknowledge structural inequalities and promote gender equality, the standalone principle on gender in the Global Digital Compact, and the Pact for the Future's commitment to leaving no one behind, we are at a crucial and defining moment. Gender must be placed at the core of this process promoting a guiding framework for shaping inclusive and equitable digital governance.

## **6. WHAT SUGGESTIONS DO YOU HAVE TO SUPPORT THE DEVELOPMENT OF THE WSIS FRAMEWORK (WSIS ACTION LINES, IGF, WSIS FORUM, UNGIS, ETC.)?**

### **1. INTERSECTIONAL FEMINIST APPROACH TO AN INCLUSIVE INFORMATION SOCIETY**

The WSIS framework must centre intersectional feminist analysis, recognising that digital exclusion is shaped by overlapping factors like gender, race, class, sexuality, disability and geography. It must move beyond binary notions of “women”, and adopt differentiated policy responses to address diverse experiences of oppression online. Gender-specific factors and targets are essential, with robust reporting and accountability mechanisms to ensure intersectionality is not just symbolic. Governments must be required to track and report on gender progress in ICT policies during WSIS follow-ups, making gender equality a measurable and accountable component of digital development.

### **2. DEDICATED FUNDING MECHANISMS FOR GENDER-INCLUSIVE ICT INITIATIVES**

The WSIS framework must prioritise public financing mechanisms that prioritise gender-inclusive ICT public infrastructure, across the layers of connectivity, data governance, and AI development. As outlined in our joint statement on gender in the WSIS+20 review process, the absence of dedicated WSIS funding streams has

significantly constrained the implementation of initiatives addressing inequality and exclusion. Future iterations of the WSIS framework should commit to sustainable, publicly financed support for infrastructure that promotes equitable access and participation for women and girls in all their diversities, ensuring that digital inclusion is not sidelined due to inadequate resourcing.

### **3. STANDALONE WSIS ACTION LINE ON GENDER**

The current incorporation of gender is insufficient and contributes to the existing gap in inclusive ICT spaces. A dedicated Action Line on gender to enable “the articulation and coordination of measures to promote better monitoring, data generation, accountability measures and financing mechanisms to respond to gender-specific challenges relating to digital technologies” is essential. Without this structural change, meaningful inclusion and the transformative impact of the WSIS agenda will not be realised.

### **4. GENDER IMPACT ASSESSMENT AS A NECESSARY IMPLEMENTING TOOL**

The IGF and WSIS Forum must move beyond symbolic engagement and adopt measurable actions to strengthen inclusive participation and leadership. This includes integrating gender impact assessments in policy processes, establishing programme tracks on technology-facilitated gender-based violence, and ensuring sustained support for civil society advancing digital rights and equity. These measures should align with the Global Digital Compact and the Beijing Platform for Action, particularly its focus on women and media. Inclusion must remain central to the WSIS framework, with governments demonstrating progress on digital equity. UN Women and UNFPA should play a key role in guiding and monitoring gender-responsive implementation.

### **5. ENHANCED TRANSPARENCY AND ACCOUNTABILITY OF MULTISTAKEHOLDER PROCESSES**

The multistakeholder process within the WSIS framework must go beyond consultation to embed transparency and accountability mechanisms that ensure meaningful participation, especially of feminist civil society. Gender-inclusive

representation must be recognised as foundational to equitable digital governance, with public financing mechanisms to support the sustained and effective participation of feminist organisations, particularly from the Global South, in the IGF, WSIS Forum and other internet governance spaces. The WSIS process should strengthen synergies with existing gender equality mechanisms, such as the Gender Advisory Board of the CSTD and Action Coalitions of the Generation Equality Forum, to institutionalise inclusive governance. To ensure legitimacy and fairness, the WSIS Forum must confront participation gaps, and guard against corporate capture. Feminist voices must be recognised as central to the future of digital governance.

## **6. LOCALISATION OF THE WSIS FRAMEWORK FOR GREATER IMPACT**

Encourage the localisation of WSIS Action Lines by supporting national-level adaptation, implementation and monitoring. This includes building capacity in national institutions and grassroots organisations to contextualise and apply WSIS principles effectively.

## **7. MONITORING AND EVALUATION OF PROGRESS WITH DISAGGREGATED DATA**

WSIS framework components could integrate obligations for industry actors, particularly those managing very large online platforms and search engines, to provide equitable access to disaggregated data and statistics essential for impact research and policy advocacy. The framework should establish dedicated funding streams to support inclusive ICT programmes that prioritise equity in access, participation and outcomes. In addition, the assessment of emerging technology must be grounded in intersectional gender analysis that takes into account diverse experiences shaped by factors such as race, geography, socioeconomic status and other systemic barriers. This comprehensive approach would ensure that the WSIS framework addresses the structural inequalities that currently prevent full and meaningful participation of marginalised communities and individuals in the information society, particularly those facing intersecting forms of discrimination.

## 7. DO YOU HAVE ANY OTHER COMMENTS?

### IMPORTANT RESOURCES:

- <https://audri.org/wp-content/uploads/2023/10/femprinciples-gdc-1.pdf>
- <https://www.apc.org/en/pubs/statement-gender-wsis20-review-process>
- <https://www.giswatch.org/2024-special-edition-wsis20-reimagining-horizons-dignity-equity-and-justice-our-digital-future>
- <https://www.apc.org/en/pubs/five-point-plan-inclusive-wsis20-review>
- <https://www.apc.org/en/news/wsis20-five-point-plan-follow-eight-practical-recommendations>

### ADDITIONAL PRIORITIES

- Action Lines C3 and C9: Measures are needed to protect media pluralism and diversity, and tackle risks to democratic integrity, especially misinformation, hate speech and gender-based cyber violence stemming from algorithms gone rogue, through effective global action on social media accountability.
- Action Line C7: There is also a need for a strong “data for development” agenda that explores appropriate and rule-based data sharing at global, regional and national levels to achieve the Sustainable Development Goals and enhances the availability of gender-disaggregated data at the national level.
- Addressing TFGBV requires comprehensive global guidelines and gender-sensitive protections within national cybersecurity policies. The WSIS framework must recognise TFGBV as both a manifestation of structural gender inequality and a fundamental barrier to women’s digital rights. This includes developing multifaceted strategies that address not only legal frameworks, but also the systemic and structural barriers to gender equality that enable such violence to flourish. The WSIS vision must move beyond individual access and acknowledge systemic barriers in achieving a just and inclusive information society.
- Owing to the impact of technological development on the environment, a feminist approach must also be applied in conversations around environmental sustainability and climate justice. The effects of the accelerated climate crisis are disproportionately experienced by women and girls, especially in the Global



South. Any future policy frameworks must be rooted in intersectional approaches, and must support sustainable and community-led infrastructure as well as circular technology economies.

- Finally, we recognise the importance of prioritisation of feminist data and AI governance frameworks with a focus on informed consent, collective rights, transparency, and dismantling of oppressive systems embedded in data and algorithmic decision making as a step towards a people-centric, inclusive and development-oriented information society. This includes resisting extractive data practices and ensuring that women and girls, in all their diversities, have control over how their data is collected, used and shared.

