

The EU Mutual Learning Programme in Gender Equality

Combatting digital forms of violence against women


Finland, 6-7 February 2025

Comments paper – Denmark



Ein Unternehmen der ÖSB Gruppe.

The information and views set out in this paper are those of the author(s) and do not necessarily reflect the official opinion of the Commission. Neither the Commission nor any person acting on the Commission's behalf may be held responsible for the use which may be made of the information contained therein.



This publication is supported by the European Union Citizens, Equality, Rights and Values Programme (2021-2027).

This programme is implemented by the European Commission and shall contribute to the further development of an area where equality and the rights of persons, as enshrined in the Treaty, the Charter and international human rights conventions, are promoted and protected.

For more information see: <https://ec.europa.eu/info/funding-tenders/opportunities/portal/screen/programmes/cerv>

Combating digital forms of violence against women in Denmark

Ask Hesby Holm

Digitalt Ansvar

Abstract

Technology-facilitated violence against women and girls is increasing in Denmark, despite Denmark's high gender equality and alignment with the Istanbul Convention. Reports indicate a rise in digital crimes like grooming, abuse, and image-based sexual violence, though many victims do not report these offenses. The political debate in Denmark has largely focused on children's digital lives, overshadowing the issue of digital violence against women and girls. Tech companies are increasingly seen as failing their responsibilities. Recent discussions have focused on deep fake pornography, prompting new legislation anticipated in 2025. The government emphasises the need for international cooperation and EU enforcement to address these issues effectively. The recommendations in this paper include establishing a Nordic policy alliance to combat technology-facilitated violence against women and girls, and documenting specific issues on platforms like Google, Instagram, and Snapchat to ensure effective enforcement of EU regulations.

1. Context

Technology-facilitated violence against women and girls is an escalating phenomenon in Denmark. This remains the case despite Denmark's high level of gender equality and the considerable progress made in aligning its national legislation with the requirements of the Istanbul Convention.¹

Although comprehensive data is limited, reports show a rise in such cases, particularly in digital crimes like grooming, abuse, and image-based sexual violence. Many victims do not report these offenses, and online platforms can unknowingly host illegal content. In response, the government has worked on legislation requiring tech companies to remove illegal content. However, proposed regulations on social media were withdrawn due to the EU's upcoming Digital Services Act. The government is now focusing on strengthening enforcement through EU regulations. Additionally, Denmark has centralised police efforts, with a specialised unit tackling digital crime.

¹ GREVIO 2024: [Violence against women in Denmark: progress made, but concerns remain over post-domestic violence custody and visitation arrangements - Portal](#)

1.1 Data

While comprehensive data on the extent of technology-facilitated violence against women and girls is lacking due to the absence of questions about digital violence in official surveys, police reports and survey data indicate an increase in such cases. At the same time, they reveal that many victims often do not report technology-facilitated violence to the police. Furthermore, online platforms, hosting providers, and websites can facilitate and store illegal images, abuse, hate speech, and defamation without the victim's knowledge.

1.1.1 Grooming, abuse, and sextortion

Existing data shows that the number of victims reporting digital offenses under the criminal code, such as grooming, abuse, and sextortion, has risen significantly in recent years. [Figures from the National Unit for Special Crime](#) (NSK) show an increase from 3,038 in 2019 to 5,327 in 2022, representing a 75% increase over the three-year period.

1.1.2 Illegal image sharing

A survey and [report](#) conducted by Digital Accountability in December 2023 show that 1.5 percent of the population have had private or intimate images shared without their consent within the past 12 months. The age group 15–17 years is at significantly higher risk of being victims of this type of incident, with 12 percent affected. A [study](#) also indicates that four out of ten shelters have accommodated women who have been victims of image-based sexual violence, where intimate images were shared without their consent.

1.1.3 Stalking

A [survey](#) conducted by the Ministry of Justice's Research Office shows that 2 percent of individuals aged 18–74 have experienced stalking within the past year. The spread of false rumours or accusations and harassment on social media are relatively common, as 37 percent and 29 percent of stalking victims, respectively, report being subjected to these during their stalking experience. Additionally, 13 percent experience electronic surveillance (e.g., through listening devices or fake Facebook profiles).

1.1.4 Online harassment

According to a [2021 survey](#), 11 percent of female private-sector employees had experienced work-related digital harassment within the past year. By the end of 2023, this [figure had risen](#) to 14 percent, indicating an increase over the two-year period.

1.1.5 Hate speech

The harsh debate on social media, characterised by the ease of commenting everywhere and minimal moderation, negatively impacts both public discourse and digital violence against women and girls. A [survey shows](#) that 69 percent of respondents report their online behaviour is affected by the harsh tone or fear of misuse, harassment, and similar issues. One in five refrains from participating in

public debate altogether due to fear of threats, harassment, or hateful comments, with 19 percent avoiding social media debates permanently for the same reasons. Young people aged 18-39 are twice as likely to face threats, while ethnic minorities and LGBTQ+ individuals are up to three times more likely to experience threats on platforms like Facebook.²

1.2 Institutional/legal provisions

1.2.1 Working Group on Digital Violations

In 2021, the Ministry of Justice established a working group on digital violations consisting of representatives from academia, civil society, and authorities. The group presented [its report](#) in 2022, which included several recommendations, such as expanding the Criminal Code's provision on acts of a sexual nature other than intercourse to also cover sexual acts that the perpetrator coerces the victim into performing on themselves. The report also recommended the independent criminalisation of grooming. Politicians were receptive to these recommendations, and in June 2022, a [political agreement](#) on initiatives against digital violations was reached. This resulted in a [legislative proposal](#), which was passed in 2023 and came into effect on July 1, 2023.

1.2.2 Legislation Obliging Social Media Platforms

Since 2017, there has been growing political focus on the role of tech companies in preventing and combating technology-facilitated violence against women and girls. In 2019, Digital Responsibility, together with member organisations and researchers, [recommended](#) that Denmark adopt a similar approach to Germany, requiring social media platforms to remove illegal content within 24 hours of receiving a report. The government [responded](#), and in 2022, it introduced a [legislative proposal](#) setting time limits for major social media platforms. However, two weeks before the second reading of the proposal, the government had to [withdraw the proposal](#). This was due to the EU's upcoming Digital Services Act (DSA), which would set new rules for digital services.

1.3 Policy measures

The National Unit for Special Crime (NSK) was established on January 1, 2022, as part of a police reform aimed at addressing challenges in handling complex cases. The reform followed several instances where cases were lost due to being passed between police districts, often involving multiple victims. NSK focuses on the most serious cases of organised crime, economic crime, and digital crime. With approximately 1,200 employees and its own prosecution service, NSK pools specialised expertise across divisions to handle cases such as money laundering, tax

²[Analyser; Hade fuld Facebookdebat skræmmer flertallet væk | Institut for Menneskerettigheder](#)

evasion, gang crime, and cybercrime. It also supports Danish police with forensic science, IT investigations, and intelligence analysis.³

1.3.1 Police reform

The most recent political agreements on the work of the police have emphasised the need for a prioritised effort against cybercrime, including cyberviolence and non-consensual sharing of intimate material. However, the proportion of cases investigated by the National Cyber Crime Centre (NC3) has decreased from 2019 to 2022. In 2022, NC3 conducted initial [investigations](#) in only 15% of grooming and sextortion cases and approx. 6% of digital sexual abuse cases.

2. Policy debate

The political debate on digital violence against women and girls in Denmark has been overshadowed by significant political focus on children's digital lives. Tech companies, especially social media platforms, have shifted from being seen as partners to companies failing to meet their responsibilities. News coverage has been dominated by cases of illegal image sharing, grooming, and retribution, with a growing emphasis on children's well-being and harmful content. Last year, the debate also centred significantly on [deep fake pornography](#) targeting women, which has led to new legislation, as described in the section below. There is less focus on the role of the police and the potential for them to alter the negative trend, which can be interpreted as an acknowledgment that, without better tech regulation and performance, the police struggle to change the situation.

The government has chosen to [focus on EU enforcement](#) and work on new legislation, particularly the Digital Services Act (DSA), which imposes concrete obligations on large companies to combat and limit violence against women if it poses a systemic risk to businesses.

2.1.1 Criminalisation of the production of deepfake pornography

In the spring and summer of 2024, there was public debate in the media about the regulation of so-called "deepfakes," including deepfake pornographic material. Among other things, [an analysis](#) demonstrated how easy it is to find illegal material online. In response, Digital Responsibility recommended stricter legislation to criminalise the creation of manipulated sexual material featuring real individuals without their consent. Currently, provisions in the Criminal Code, including § 232 on indecent exposure and § 264 e on identity misuse, cover the sharing of deepfake pornographic material. In October 2024, the government announced that it would follow the recommendation and criminalise the production of deepfake pornography. The amendment to the Criminal Code is expected in the first half of 2025.⁴

³ [Organisationen | Virksomheden | Politi](#)

⁴ [Faktaark-over-initiativer.pdf](#)

3. Good practice examples

3.1.1 Definition of Digital Violence

Digital violence can have serious consequences for victims' privacy, mental health, and reputation. However, legislation, enforcement, and prevention have not kept pace with the rapid development of harmful digital actions. This is partly due to limited knowledge about digital grooming, manipulation, violations, hate, and harassment, as well as a lack of shared understanding and terminology for these new forms of harm. To address this, Digital Accountability, in collaboration with experts, researchers, and organisations, developed a [definition of digital violence](#) presented at a conference at Parliament in early 2022. The definition focuses on the harm caused by actions rather than solely on intent. It includes both illegal and non-illegal harmful actions and recognises that harm can also result from technology, such as algorithms, rather than solely from human perpetrators.

3.1.2 Campaign on Digital Harassment and Research

In 2023, the Danish Working Environment Authority launched a [major campaign](#) to highlight the need to address digital harassment from customers, guests, and other external parties in workplaces. The campaign aimed to emphasise the importance of clear guidelines on who does what if an employee experiences digital harassment. Digital harassment is covered by the Working Environment Act and, according to the law, must be prevented and addressed as a workplace issue on par with other forms of psychological violence.⁵

3.1.3 AI Technology for Identifying Abuse Victims: Pilot Project and Future Potential

From January to November 2023, the National Unit for Special Crime (NSK) piloted AI-driven facial recognition to identify children and young victims of sexual abuse. The technology matched victim images with police databases or case-specific material. NSK found that the tool greatly enhanced victim identification, sped up case resolutions, and increased the likelihood of stopping ongoing abuse. The tool will be permanently implemented as a support tool, with investigators making final case assessments. The trial could also inspire efforts to protect adult victims.⁶

4. Transferability aspects

In Denmark, we could draw inspiration from Iceland's approach of integrating international platforms like stopncii.org and takeitdown.ncmec.org to limit the spread of non-consensual imagery. By mainstreaming these services in 2021, Iceland empowered victims, utilised existing tools, and created a unified support system. This

⁵ [Arbejdsmiljøloven](#) ; [Hvad er digital chikane?](#)

⁶ [Ny teknologi skal hjælpe politiet i indsatsen mod seksuelt misbrug af børn | Justitsministeriet](#)

method was implemented through collaboration between the police, social workers, NGOs, and educational institutions, offering training and standardised responses for those affected by digital sexual harassment. Denmark could adopt a similar strategy by integrating accessible international platforms into its domestic victim support services, ensuring a more cohesive approach to digital violence.

We can also learn from the following approach from Iceland, emphasising the transferability of addressing digital sexual abuse. Rather than treating it as an isolated issue, efforts were made to highlight its connections to existing and recognized patterns of behaviour and well-established criminal concepts. This approach prevented power struggles and allowed for the inclusion of a range of stakeholders with various experiences.

In Denmark, we could be inspired by Finland's approach to digital violence. Finland's Action Plan for Combatting Violence against Women (2020–2023) included successful measures to prevent and raise awareness of digital violence. The 2023 reform of sexual offences in the Criminal Code also strengthened rights to sexual self-determination and personal integrity.

5. Conclusions and recommendations

Digital violence against women is not a uniquely Danish phenomenon. It is clear that police and prosecution, as well as protection under the criminal code, are not sufficient, as the internet transcends borders and tech companies are not headquartered in Denmark. This means that international regulation in the form of conventions and EU regulations is crucial. Therefore, stronger international cooperation is needed.

Recommendation 1: Establish a Nordic policy alliance to combat technology-facilitated violence against girls and women, similar to the newly established Nordic alliance on children ([NOCTA](#)).

To ensure EU enforcement and the development and fine-tuning of existing instruments, especially the Istanbul Convention, it is important to gather concrete documentation on what girls and women are subjected to on digital platforms and what safety measures these platforms use. Without concrete data and knowledge about the problems on specific platforms/service providers/search engines and what they are doing to help authorities and minimise the problem; it will be difficult to enforce EU regulations against them and indirectly fulfil Member States' obligations.

Recommendation 2: It is recommended to document specific issues (e.g., illegal image sharing or hate speech) on specific platforms (e.g., Google, Instagram, or Snapchat).