

## Gender in Digital Coalition's Contribution to the Global Dialogue on AI Governance

7 may 2025

Questions:

A. Priorities:

1. In your opinion, what outcomes would make the first Global Dialogue on AI Governance a success?

**a. Gender-transformative and human rights-centred AI governance**

In line with the Coalition's earlier recommendation and embedded in Global Digital Compact commitments, gender equality must be a core principle of AI governance through a gender-transformative approach. This includes addressing underlying structural inequalities and recognising power in AI systems, both online and offline, while mainstreaming gender across all areas of the Dialogue. As outlined in paragraph 55 of the GDC, the Dialogue must be anchored in international human rights law, ensuring that commitments translate to accountability, effective action, and meaningful civil society participation.

**b. A transparent and accountable multistakeholder process**

The Dialogue must serve as an agenda-setting platform that bridges fragmented processes, particularly between AI and data governance, while ensuring meaningful participation, especially from Global South and civil society stakeholders. It should move beyond symbolic inclusion to enable affected communities, including women and gender-diverse people, to shape priorities from the outset.

**c. A decentralised and people-powered AI**

AI governance must address global inequalities embedded in political and economic systems, including data extractivism and uneven distribution of benefits. Domain communities – health, labour, human rights – must be equal partners to define what AI should enable, recognising that women and gender-diverse people are disproportionately impacted across these sectors.

**d. Safety and consent by design**

The Dialogue must explicitly recognise gendered harms and move beyond gender-neutral approaches. Clear regulatory red lines are required for harmful applications, including deepfakes and AI-generated abuse, with moratorium for systems that violate human rights.

**e. Accountability, impact assessment, and financing**

A binding due diligence framework, including mandatory pre-deployment of gender impact assessment, is essential to shift accountability onto those deploying AI. This must be supported by sustainable financing for inclusive AI initiatives and for the meaningful participation of women's and LGBTQIA+ rights organisations.

2. From your perspective, which of the following thematic areas identified by the General Assembly Resolution 79/325 for the AI Dialogue reflect your priorities for urgent action and active engagement by your entity? Please select up to 4 priorities.

**a. Safe, secure and trustworthy AI**

b. AI capacity-building

**c. Social, economic, ethical, cultural, linguistic and technical implications of AI**

d. Interoperability of governance approaches

**e. Protection and promotion of human rights**

**f. Transparency, accountability, and human oversight**

g. Open-source software, open data and open AI models

3. Please briefly explain your selection.

**a. Safe, secure and trustworthy AI**

Safe, secure and trustworthy AI cannot be defined without addressing gendered harms. AI systems enabling TFGBV, deepfakes, gendered disinformation, and surveillance-based abuse are not trustworthy by any standard. Safety standards and accountability measures must be grounded in the lived realities of women and gender-diverse people, particularly in the Global South. The Dialogue must adopt an operational human rights-based definition of AI, one that incorporates gender as a structural axis and is grounded in international human rights law

**b. Social, economic, ethical, cultural, linguistic and technical implications of AI**

These implications are inseparable from gender and power. Women, girls and gender-diverse people, particularly in the Global South, remain underrepresented across the AI value chain, from leadership to product development to deployment. Systems built without their knowledge, language or realities embedded in the design reproduce and scale inequality, reflecting who controls AI development, whose knowledge is recognised and whose resources and labour are extracted.

**c. Protection and promotion of human rights**

Gendered implications of AI, including TFGBV, must be treated as a standalone human rights concern, rather than addressed through general online safety language that invisibilises gendered harms. Existing frameworks are fragmented and lack enforceable entry points, leaving gaps in protection, enforcement and access to remedy.

**d. Transparency, accountability and human oversight**

Voluntary corporate or State commitments have failed to protect women, girls and gender-diverse people from platform and other AI-enabled harms. Binding due diligence, including mandatory gender impact assessments, is essential, alongside red lines and operationalising the moratorium urged by the OHCHR and other UN bodies on systems that violate human rights.

**4. In your opinion, are there any cross-cutting or emerging issues not captured by the listed themes above? If so, please explain.**

**a. Digital colonialism through gendered data extractivism**

AI systems built on data extracted from Global South communities, without consent or benefit-sharing, reproduce colonial power relations while excluding those communities from governance. Women and gender-diverse people bear disproportionate harm, both as subjects of extractive data practices and as people excluded from decision-making. As the Coalition highlighted in its WSIS+20 Elements Paper submission, “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.” The Elements Paper can be found here:

<https://www.apc.org/sites/default/files/wsis-ep-gender.pdf>

**b. The full AI value chain**

The thematic framing focuses on AI systems but largely ignores hardware, supply chains, data centres, and the labour conditions. Women workers, particularly in the Global South, are concentrated in precarious and least visible roles, including data annotation, content moderation, and electronic manufacturing, often also bearing the most serious consequences of natural resource extraction, including climate crises. There is a need to explore new economic models rooted in care for affected and invisibilised communities.

**c. Feminist data governance principles**

Collective rights, community control over data, and informed consent beyond individual click-through are absent from current thematic framing. These are foundational to whether AI governance serves people or extracts from them.

**d. Fragmentation of the AI governance field itself**

Communities working on AI safety, participatory AI, and algorithmic accountability are increasingly operating in separate languages with separate red lines, and with thinning connective tissue to the broader multilateral system — where health, labour, climate, and development expertise actually lives. The Dialogue has a specific opportunity to rebuild that connection before it becomes structurally irreversible.

## B. Impact of AI Governance

5. How are the governance gaps and related developments/advances in the thematic areas you selected above affecting your country, region, or sector? Please highlight the most significant challenges and opportunities.

a. AI systems implemented in public services, digital public infrastructures, and content moderation in the Global South operate without mandatory gender impact assessments, creating risks of

discrimination, surveillance and exclusion that fall hardest on already marginalised communities.

b. WHRDs and activists, particularly those working on gender justice, are disproportionately targeted by AI-based harassment and surveillance. These risks are absent from many global AI frameworks and action plans, highlighting how quickly these concerns are deprioritised when feminist civil society is not adequately represented in agenda-setting.

c. The concentration of AI development in Global North corporations, and the lack of meaningful involvement from the Global South and marginalised communities in general at early design stages mean that AI systems routinely fail women, girls and gender-diverse people. Their languages, cultural contexts, and lived realities are ignored, leading to exacerbated harms when AI tools are deployed and commercialised.

d. The most significant opportunity lies in the multilateral system, which already convenes the domain communities whose expertise is missing from AI governance. The World Health Assembly, the ILO, the Human Rights Council, and CSTD hold mandates, constituencies, and deep knowledge of the systems AI is transforming. What is missing is the activation of AI governance within these processes, on their terms. The Dialogue can catalyse that activation.

e. Women and gender diverse people experiencing TFGBV, particularly in the Global South, face a governance gap as national laws are fragmented, mainly punitive, and insufficiently integrated with broader gender-based violence frameworks. This limits access to effective, survivor-centred remedies and support mechanisms. In the context of AI-generated harms, like deepfakes and gendered disinformation, for example, most national frameworks remain narrow, leaving significant gaps in protection, accountability and redress for emerging forms of gender-based violence involving AI.

## C. International cooperation on AI governance

### 6. What role can the AI Dialogue play in advancing international cooperation on AI governance?

a. The Dialogue must create formal structural bridges between AI governance and the data governance processes, so that gender-just data governance principles, including feminist approaches to consent, collective rights, and communities' sovereignty over their data, are carried across both processes rather than being siloed.

b. The Dialogue must advance cross-border parameters for monitoring AI-related gender based harms, recognising that the absence of such mechanisms leaves women and gender diverse people, particularly in the Global South, without multilateral recourse when violence crosses jurisdictions. At the same time, we caution that cross-border monitoring frameworks carry inherent risks of state repression and misuse against the same populations they are designed to protect, including WHRDs, journalists, and activists. Any such mechanism must be grounded in international human rights law, subject to independent civil society oversight, and explicitly prohibited from being used as an instrument of transnational repression.

c. The Dialogue must actively resist the tendency to centre economic and technological innovation while downplaying gender-related harms, as is visible in recent global and national AI processes and action plans. This requires that gender equality be a named, tracked, and reported outcome of the Dialogue, rather than a cross-cutting theme that is invisibilised in practice.

d. The Dialogue should advance international convergence around the operationalisation of moratoria on AI systems that pose significant risks of human rights violations, including gender-based harm and systems enabling or amplifying TFGBV. Such precautionary measure is essential to prevent irreversible harms and should remain in place until robust, gender-responsive safeguards, accountability frameworks, and access to remedy are effectively established.

**7. What are some of the existing initiatives, partnerships, or mechanisms that the AI Dialogue should build upon or connect with, and what added value could the AI Dialogue bring?**

- a. The UNESCO Recommendation on the Ethics of AI and its Women4Ethical AI Platform:  
<https://unesdoc.unesco.org/ark:/48223/pf0000381137>
- b. OECD AI Principles
- c. The UN Guiding Principles on Business and Human Rights
- d. The Global Digital Compact, including the GDC principle on gender equality, secured through sustained feminist civil society advocacy led by the Gender in Digital Coalition, as a baseline that the Dialogue must implement rather than renegotiate.
- e. G7 Hiroshima Guiding Principles on AI
- f. The Sao Paulo Multistakeholder Guidelines (2024) as a procedural standard for meaningful inclusive participation.
- g. The UNESCO Recommendation on the Ethics of AI and its Women4Ethical AI Platform:  
<https://unesdoc.unesco.org/ark:/48223/pf0000381137>
- h. Guiding principles for law and policy reforms to address TFGBV, by UNFPA and Derechos Digitales, that outline a framework to advance laws that protect, repair, and uphold the rights of survivors of TFGBV:  
<https://www.derechosdigitales.org/en/recursos/guiding-principles-for-law-and-policy-reform-to-address-technology-facilitated-gender-based-violence-towards-a-system-of-accountability/>

These initiatives collectively establish a normative foundation across WSIS, GDC, CSW, and UNESCO processes, which the Dialogue should operationalise rather than duplicate.

## D. Inclusive participation

**8. How can different stakeholders contribute to the AI Dialogue?**  
Please share recommendations for the format and structure of the AI Dialogue.

Meaningful multistakeholder participation, particularly of civil society with expertise in human rights and gender, is essential. Participation is a human right in itself, and a necessary condition to ensure that AI governance processes uphold human rights and advance gender equality in practice.

As highlighted in the recommendations presented in the joint letter addressed to the co-chairs of the Global Dialogue, this requires clear procedural guarantees, transparency, and equitable conditions for engagement, especially for underrepresented actors. The letter can be found here:

<https://www.derechosdigitales.org/en/recursos/letter-to-un-ai-global-dialogue-co-chairs-procedural-recommendations/>

Civil society must have formal speaking rights in plenaries and dedicated participation in expert panels, alongside access to briefings and real-time exchange with Member States. The Dialogue should establish a clear timeline with predictable submission windows, enabling organisations (including feminist and Global South groups facing structural funding constraints) to participate effectively.

A multistakeholder advisory group should be created, with guaranteed representation of feminist and gender-focused civil society, to provide ongoing substantive input. This should include WHRDs, LGBTQIA+ organisations, Indigenous communities with distinct data sovereignty interests, and informal sector women workers affected by AI-driven labour displacement - communities that are largely absent in current AI discussions.

Participation must also be adequately resourced, including financial support, multilingual access, and hybrid formats. In-person meetings should be located with consideration for visa barriers and unequal mobility regimes that shape who can be present.

Finally, sequencing is a critical structural choice. If the Dialogue opens with technical or corporate perspectives, it will reproduce existing power asymmetries. Instead, each session should begin with affected communities and rights holders, ensuring that governance priorities are grounded in lived realities.

## **9. Which voices, communities, or perspectives are currently underrepresented in global discussions on AI governance? How could they be included?**

- a. Global South feminist, digital rights, and gender justice civil society organisations, are consistently underrepresented in AI governance processes. While section 11 of Resolution 79/325 addresses support for

travel funding, this is a narrow and most foundational understanding of what participation requires. Core funding, translation, and meaningful participation in agenda-setting must also be addressed.

b. WHRDs, LGBTQIA+ organisations, Indigenous communities with distinct data sovereignty interests, and informal sector women workers affected by AI-driven labour displacement are all largely absent.

c. Women and gender-diverse people engaged in platform-based work, who face heightened precarity and algorithmic control, as well as communities (and specifically women from those communities) impacted at the territorial level by AI infrastructures, such as the environmental and resource burdens associated with data centres and related extractive processes.

The GiDC members' verbal input specifically flags that the global AI discussions, including the recently held AI Impact Summit in India, overlook the concerns around gendered algorithmic bias, structural inequalities, weaponisation of AI against WHRDs, which is a direct indication of whose concerns are treated as peripheral when feminist voices are not structurally embedded in governance.

Underrepresentation is exacerbated when women and gender diverse people from the Global South are absent from the rooms where AI governance is shaped. The resulting frameworks mirror their absence, as a result, making future inclusion harder.

## 10. What innovative engagement formats could most effectively foster meaningful and dynamic engagement during the AI Dialogue?

a. Hybrid and flexible time zones must be standard, with written submissions maintained as a formal option.

b. Dedicated thematic sessions on TFGVB and AI, algorithmic bias in foundation models, impacts of unbalanced datasets on health, justice and economic opportunity, gender and the AI value chain, and feminist data governance, using feminist facilitation methods that actively counterbalance power asymmetries in the room.

c. The Dialogue should explore hosting sessions and following editions outside the Global North to shift geography for these processes.

Structured feedback mechanisms between the AI Scientific Panel and civil

society, so that the panel's annual assessments reflect feminist and Global South knowledge, not only institutional research networks.

d. The Dialogue should provide formal support to organisations working at the intersection of gender justice and AI, not only to participate in the Dialogue, but also in the critical preparatory conversations embedded within existing inter-governmental convenings in the lead up to the Dialogue, such as HRC, CSTD and ILO, where they occur, so that positions can be developed and articulated through discussion and consensus ahead of time. This would allow the Dialogue to become a convergence, rather than a starting point, of key positions and visions.

## E. Good practices and policy approaches

### 11. Please share examples of policies, practices, platforms, or approaches that promote effective AI governance or offer concrete solutions to addressing its challenges.

Some of the most instructive governance precedents for AI come from outside the technology sector. The Belmont Report (1978) emerged from a bioethics crisis and succeeded because it brought together not only scientists and regulators but ethicists and community representatives, starting from values rather than from the technology it sought to govern. Elinor Ostrom's work on governing the commons demonstrated that the most durable governance systems are built by the communities closest to the resource, not imposed from above — a direct challenge to the assumption that AI governance must be expert-driven in the narrow technical sense. The IPCC model offers a template for how domain expertise can be made legible to governance without being flattened.

What these examples share: governance that begins from the knowledge of affected communities, holds competing values in productive tension, and builds legitimacy through participation rather than prescription. The Gender in Digital Coalition would add one additional principle: governance that names gender as a structural axis from the outset produces better outcomes than frameworks that attempt to retrofit gender after the architecture is set.

These approaches resonate with feminist digital governance principles advanced by the GiDC across its continued engagement with WSIS and GDC processes.