Policy Paper with Recommendations for Combating Gender-based Online Violence in Croatia

Zagreb, 2022
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Electronic (online) violence, and especially violence related to gender represents a significant, growing challenge that is still insufficiently solved by public policies in the world and in Croatia. Victims of electronic violence are both women and men, with the stress that violence against women is more frequent and involves more devastating consequences for the person and their environment. Women and men experience different forms of electronic abuse. Thus, women are more often victims of online stalking and pornography without consent, while men are victims of threats of physical violence and forced viewing of pornography.

Considering the widespread violence against women, which is recognized as a significant social problem in our country by a series of conventions, strategies, laws and other public policy documents, online violence against women is part of the comprehensive fight against this worrying phenomenon. Online forms of violence against women are becoming more common, especially with the growing daily use of social media platforms and other digital applications. This technological development is especially critical for new generations of girls and boys, who extensively use new technologies to develop relationships with each other, but which also affect all aspects of their lives.

According to the definition of the Committee on the Elimination of All Forms of Discrimination against Women (CEDAW), a body composed of independent experts responsible for monitoring the implementation of the UN Convention on the Elimination of All Forms of Discrimination against Women, violence against women is a form of discrimination against women and a violation of human rights that falls under the Convention on elimination of all forms of discrimination against women and other international and regional instruments according to which violence against women includes gender-based violence against women, i.e. violence directed against a woman because she is a woman and/or because it disproportionately affects women. The Declaration on the Elimination of All Forms of Violence against Women further specifies that violence against women is any act of gender-based violence that results, or is likely to result, in physical, sexual or psychological harm or suffering to a woman, including threats of such acts, coercion or arbitrary deprivation of liberty, whether in public or private life.

The definition of online violence against women therefore extends to any act of gender-based violence against women that is perpetrated, facilitated or exacerbated in part or entirely through the use of Internet-communication technologies (ICT), such as mobile phones and smartphones, the Internet, social media platforms or e-mail, and that is directed against a woman because she is a woman, or affects women disproportionately.
A major challenge in the fight against online women abuse is the rapid development of technology and new forms of online violence. In addition, there is not enough relevant research that would comprehensively show the depth and spread of the problem, especially for Croatia. Another problem is terminology, which is uneven at the global level, and even at the European level, and is still developing. Several official United Nations reports refer to the general term "information and communication technologies", while other reports refer to "online violence", "digital violence" or "cyber violence". In some documents, the term "online violence" is used, because it is simpler and more understandable, and serves as a substitute for the most inclusive term - "ICT-facilitated violence against women". Furthermore, although it refers to "violence against women", it includes violence against both women and girls, wherever it can be applied to girls. At the same time, it should be emphasized that it is girls who are most often affected by this type of violence. In this document, we use the term "online violence against women", implying both of the mentioned remarks.

According to the research of the European Union Agency for Fundamental Rights (FRA) "Violence against women: an EU-wide survey", carried out in 2012, it is estimated that 23% of women have experienced online abuse or harassment at least once in their life, while 1 in 10 experienced online violence after the age of 15. The fact that these 10-year-old insights are still used as key in a series of documents by the European Union, the United Nations, the World Health Organization and other key international stakeholders speaks about the problem of poor monitoring of online women abuse.

This analysis was conducted as part of the project "Surf & Sound", which aims to reduce and prevent online violence against women. The project is carried out by the B.a.B.e. association and partners to increase knowledge and public awareness of the problem, by accumulating knowledge and raising awareness of online violence against women among relevant stakeholders and the general public. The project, at the same time, provides useful tools for reporting violence online and counselling women (web platform NEON – NO to online violence https://babe.hr/neon), a training for experts who are in contact with victims and can apply action in their field, as well as two policy-related contributions aiming to improve related policy and legal framework: Code of Conduct for Professionals Working with Cases of Online Violence and this Policy Paper with Recommendations for Combating Gender-Based Online Violence. Both publications will be uploaded and publicly available on the platform.

The purpose of this document is to strengthen the protection of women from online violence, and it is based on a) insights of key stakeholders gathered through capacity building activities as part of the project, b) analysis of the policy framework for the

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prevention and combat against gender-based online violence, c) analysis of the correspondence between domestic policy framework with the European Union framework d) identification of gaps in public policy documents and practices. The document is written for policy makers, coordinators of the activities against online violence and other key stakeholders, with an emphasis on recommendations for their actions.

WHO ABUSES WHOM MOST FREQUENTLY –
ABUSERS’ PROFILE AND VICTIMS’ PROFILE

According to the research hosted by the European Parliament\(^2\), the most frequent abusers are blood relatives, acquaintances, former or current partners, co-workers (colleagues), schoolmates, and anonymous users. Abusers of young women on social networks, as groups especially at risk of this type of violence, are strangers, anonymous users, people from social networks who are not friends, people from school/work, friends, groups of strangers, and current/former partners\(^3\). While the existing research still does not provide comprehensive insights into the statistics of sex, age, or the social status of abusers, it is clear that, unlike physical abuse, electronic abuse is characterized by a high level of anonymity. Also, research shows that, although men are in the lead, women in a significant number of cases act as abusers of women\(^4\).

Some types of online violence are carried out by several perpetrators at the same time, such as mob attacks, online bullying, or sexual harassment by the entire community. Non-consensual photo sharing is also facilitated by tens, hundreds, or thousands of people. Behaviour called 'mob mentality' is typical of social media because the perpetrators are hidden behind anonymous profiles, feel untouchable and supported by the community or, when they attack under a real name, do not make the connection between the person they are attacking online and the real person. Algorithm designs allow mobs to form because they favour engagement and growth above all else. Despite efforts to identify violent language and visual content, algorithms push such content by giving it more visibility and

\(^{2}\) European Parliamentary Research Service (2021) *Combating gender-based violence: Cyber violence*

\(^{3}\) Plan International, (2020) *Free to be Online?*

\(^{4}\) European Parliamentary Research Service (2021) *Combating gender-based violence: Cyber violence*
enabling polarization. In addition, such content can be further emphasized, and their sharing among various misogynist groups is facilitated through hashtags\(^5\).

Victims of electronic violence are most often young women aged 18 to 29, who are online the most and have a harder time recognizing this type of violence. On the other hand, they are also the most inclined to report violence. While women most often experience their first online abuse at the age of 14, research\(^6\) suggests that many girls are strongly affected by online abuse from the age of 12-13. Violence especially affects women who are active online, such as journalists, politicians, and feminists, and a significant proportion of attacks are directed at members of the LGBT community, ethnic and religious minorities, and people with disabilities\(^7\).

In terms of abuser-victim relationships, a 2011 British survey found that more than half (54\%) of female respondents had met an online abuser for the first time in real life. But since the beginning of the COVID pandemic, it seems that women are being abused by strangers more often as they interact more online. Research published during the pandemic\(^8\) showed that 84\% of respondents experienced online violence by a stranger, 16\% experienced online violence by an acquaintance, 10\% by a partner or ex-partner, and 9\% by a colleague or a superior at work\(^9\).

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**WHAT ARE THE MOST COMMON FORMS AND PLACES OF ABUSE?**

The abuse takes place on a whole range of social channels and platforms. While Facebook, Instagram, Whatsapp, Snapchat, Twitter, TikTok\(^10\) dominate among the platforms, abuse

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\(^5\) Council of Europe (2021) *Protecting women and girls from violence in the digital age - The relevance of the Istanbul Convention and the Budapest Convention on Cybercrime in addressing online and technology-facilitated violence against women*

\(^6\) Plan International (2020) *Free to be Online?*

\(^7\) European Parliamentary Research Service (2021) *Combating gender-based violence: Cyber violence*

\(^8\) Glitch and End Violence against Women (2020) *The Ripple Effect, Covid-19 and the epidemic of online abuse*

\(^9\) Council of Europe (2021) *Protecting women and girls from violence in the digital age - The relevance of the Istanbul Convention and the Budapest Convention on Cybercrime in addressing online and technology-facilitated violence against women*

\(^10\) Plan International (2020) *Free to be Online?*
also takes place on various chat services, forums, and through electronic or SMS messages or groups.

![Platforms on which female respondents experienced violence](image)

Source: Plan International (2020) *Free to be Online?*

With this, the list of platforms and channels of online abuse is not exhausted, and each country has different statistics depending on the digital habits of their users. However, most forms of online violence occur on different platforms, both private (SMS, WhatsApp, Messenger, Viber, e-mail...) and public. Violence often happens at the same time on many platforms and via different tools. Victims can be abused through all their social media platforms and their messaging services, but also via email, by phone, or by physical assault at home, at work, or on the street. The new French law against sexual violence and sexist violence considers the fact that 'mob attacks' are typical behaviour and takes into account the repetitive aspect of harassment, the multiple locations, and the fact that multiple attackers can harass the same victim at the same time.

There is no single classification of types of online gender-based violence, and with the development of technology, new forms are emerging. Here, we present systematic overlive

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11 Council of Europe (2021) *Protecting women and girls from violence in the digital age - The relevance of the Istanbul Convention and the Budapest Convention on Cybercrime in addressing online and technology-facilitated violence against women*
of forms that online violence can take, as used by the European Parliament with the addition of a few relevant types:

**Typology of Online Violence Forms**

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<thead>
<tr>
<th>LABEL</th>
<th>EXAMPLE/DEFINITION</th>
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| **Cyber-stalking** | • One user repeatedly sending unwanted e-mails or text messages to their victims  
| | • Can also involve sexual advances or requests, threats of violence, and surveillance of a victim’s location through a variety of technologies |
| **Trolling** | • An activity which is carried out online on public forums, associated with activities where debate is encouraged  
| | • Involves posting off-topic material in large quantities, as well as inflammatory or confusing messages  
| | • Perpetrators are usually anonymous  
| | • Often targeted against women with threats and/or fantasies of sexual violence |
| **Cyber harassment and bullying** | • Offending a person online with unwanted, sexually explicit messages, threats of violence, or hate speech  
| | • A persistent and repeated course of conduct targeted at a specific person, designed to cause severe emotional distress and often a fear of physical harm |
| **Hate speech online** | • All forms of expression, which share, encourage, promote or justify race hatred, xenophobia, anti-Semitism or every other form of hatred based on intolerance including aggressive nationalism, ethnocentrism, discrimination and hostility of minorities, emigrants or persons of foreign origin  
| | • Hate speech campaigns are often efficiently organised, in which the same victim or group of victims are simultaneously targeted by multiple perpetrators |
| **Flaming** | • Vitriolic content, denoted by explicit language and misogyny  
| | • Deliberately using heated, emotionally charged or contrarian statements to elicit a response from another online user |
| **Image-based sexual abuse/ Non-consensual pornography** | • The sexually explicit portrayal of one or more persons that is distributed without the subject’s consent  
| | • Often committed by a victim’s former partner and posted on a specialised website or social media profile  
| | • Involves posting or distributing sexually graphic images or videos.  
| | • Up to 90% of non-consensual pornography victims are women  
| | • Contrary to its name, this need not be motivated by personal revenge. Perpetrators may be seeking sexual gratification, or want the victim to do something for them, using the images as a form of social or economic blackmail  
| | • When the victim is a minor it is considered child pornography |
| **Doxing** | • Publishing a victim’s personal details and sensitive data online, such as home address, photographs, name and the names of family members. |
| **Swatting** | • Abuse of computer systems with violent, physical impact on victims  
| | • By using telephones and computer systems, emergency service fraud is carried out, in order to send the police to a specific location based on a false report  
| | • It can be frightening and dangerous for victims, as individuals are killed by responding special forces or suffer physical injuries such as gunshot wounds or heart attacks |
| **Sexual extortion** | • Manipulation or coercion in order to perform sexual activities for the benefit of the abuser and/or take sexually explicit images/videos that the victim is forced to send to the abuser  
| | • Abuser may threaten to share such images/videos; the threat of harming the victim’s family or friends - if he does not engage in the requested sexual activity  
| | • Motivation of the abuser can be revenge, humiliation of the woman or financial gain |
| **Online grooming** | • When someone befriends a child or young person online (which often involves impersonation) and builds their trust with the intention of sexual or other exploitation and psychological and/or physical abuse |
Sexing

- Sharing sexually explicit content online through private messages, which may include sending nude or semi-nude photos or videos, as well as sexually explicit messages
- Although it is often a voluntary submission by both parties who are of a similar age, it can escalate into online sexual abuse or exploitation, especially if there is coercion to send such content, then if one person is much older than the other or is in a position of power


While researchers differ in considering the relationship between the percentage of abused women and the percentage of abused men, they agree in the conclusion that the forms of abuse for these two social groups are different, and the consequences for women are more extreme. According to research by the European Parliament\textsuperscript{12}, 38% of women abused online had an extreme or very disturbing experience, and only 17% of men claim the same.

Women are most often victims of derogatory remarks, trolling with sexual photos (penis), stalking on the Internet (posting sexual videos, rape) or publishing intimate photos and videos without permission and threats. Men are most often the victims of defamation and fabricated claims that cause reputational damage\textsuperscript{13}.

Various forms of online harassment of women are carried out by sending unwanted, offensive, sexually explicit e-mails, messages and SMS or sexual comments (advances) on social media. Young women, as the most frequent victims of violence, are attacked with violent, derogatory and offensive messages, intentional shaming, body shaming, threats of sexual violence, sexual harassment, online stalking, racist comments, anti-LGBTQ+ communication and threats of physical violence.

The forms and frequency of abuse are constantly changing with the development of technology and changes in online habits. Countries with higher levels of violence against women also have more online abuse against women, just as countries with greater access to the Internet have more abuse.

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\textbf{CAUSES OF ONLINE WOMEN ABUSE}

\textsuperscript{12} European Parliamentary Research Service (2021) \textit{Combating gender-based violence: Cyber violence}

\textsuperscript{13} Plan International (2020) \textit{Free to be Online?}

European Parliamentary Research Service (2021) \textit{Combating gender-based violence: Cyber violence}
Women are most often attacked because of gender, sexual orientation, ethnic background, religion and disability. Each of these groups suffers a unique, a specific form of abuse.

The central pattern of violence is control: the obstruction of one’s physical space continues in the digital space, by monitoring Internet activities and monitoring messages and calls. According to some research, the desire for control is the main motive behind the abuse of former and current partners.

Stalking of women clearly spills over into the online space, while this is not the case for men. In fact, women victims of offline violence are three times more likely to be stalked online than men. It is very interesting that no significant correlation was found between some form of offline abuse and online abuse when it comes to men. This indicates a trend according to which men encounter bullies online in an unplanned (ad hoc) manner, because of the expressed opinions and attitudes. Women, on the other hand, are more often systematically targeted/monitored and abused and abusers target them online.

Research of Plan International has shown that there are two dominant motives for abusing girls. Firstly, girls are being abused just because they are girls, and they are online. It is unimportant what they say and how they behave. Abuse is more frequent if they are also members of a minority group. In that case, abuse is more often of a sexual manner. Secondly, girls are being abused because they are 'loud' online. Abusers attack female activists, journalists, and politicians because of the content and attitudes they present. Therefore, they are attacked because of their views, most often because they take feminist viewpoints and/or speak out against abuse and abusers.

Men abusers have the desire for control, which makes them believe they have the right to dominate and dehumanize women by seeing them as objects or property. In some cases, usually in more severe forms of abuse, the narcissistic disorder also leads to a lack of empathy and the need for attention and admiration. They often blame the victim for encouraging violence, all to justify their own violent behaviour.

While the ways and consequences of gender-based abuse have been well researched, it is still little known about motives that boys and men might have to commit violence against women. According to a recent study of abuse patterns in the Middle East and North Africa, the reasons could be found in deeper socio-economic patterns such as high unemployment, political instability, and pressure on men (especially in rural and

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14 Ordered by: European Parliamentary Research Service (2021) *Combating gender-based violence: Cyber violence*

15 European Parliamentary Research Service (2021) *Combating gender-based violence: Cyber violence*

16 Plan International (2020) *Free to be Online?*

underdeveloped areas) to provide for their family’s daily needs. As they often fail to achieve the own high aspirations, they are stressed, depressed, and feel humiliated - they abuse women to "put them in their place", and researchers believe that they may want to confirm or reaffirm their power when they are already unable to do it at the economic field of generally in life. Considering that many young men in such environments cannot find a job, cannot afford marriage, and cannot start a family, they do not know what to do with themselves, which makes them stuck in a "suspended state of adolescence". Researchers believe that harassing women is their way to get some excitement or to have fun, which is what up to 90% of men said when asked why they sexually harassed women in public places. Needless to say, it is no fun for women. It can be assumed that these aspects of the motivation for harassing women exist in the online world as well, and that new research and studies will analyse the motivations of abusers more deeply so that they can be addressed and that, consequently, harassment and abuse of women can be reduced.

CAUSES OF WIDESPREAD VIOLENCE AGAINST WOMEN: FOUR TRACKS

Gender-based online violence represents a significant challenge for EU member states - partly because of an inadequate public policy framework, and partly because the problem itself is inherently complex and difficult to address.

The causes of online abuse against women can be seen through four tracks: 1) Lack of awareness and lack of information, specific culture on the Internet and in the media; 2) Development trends and features of ICT use that favour the spread of online violence; 3) Lack of data and evidence-based adaptation of the legislative framework at the national and EU level; 4) Challenges in implementing regulations, providing support to victims and working with (potential) perpetrators of violence.

1) LACK OF AWARENESS AND INFORMATION, INTERNET AND MEDIA CULTURE

Lack of awareness in the private and public spheres remains a major challenge due to various reasons, including entrenched gender stereotypes. Victims are often unaware of their rights and/or they often face obstacles in obtaining support, reporting crimes, and
recovering from them. The low rates of online violence reports are partly related to these barriers, along with other factors such as fear. At the same time, not enough efforts are invested in the research of the prevalence and effects of this phenomenon, thus limiting the collective knowledge about the problem.

Recent research on the attitudes of high school students towards violence in intimate relationships of young people illustrates the problem of unawareness and lack of information among young people in Croatia. 40% of them do not recognize the so-called digital control in the relationship (which manifests itself as excessive texting, so the person expects the partner to be available all the time and respond to messages immediately) as a form of violence in the relationship, while 36% of them do not know if it is violence. A greater number of boys than girls do not consider this behaviour to be violence (58% versus 34%). In the case of non-consensual pornography, from the position of an observer, only 40% of respondents acknowledge that they would be worried for the victim, while one quarter of young men and a one fifth of girls blame the victim for the violence. This is quite worrying, especially because most of them know that such behaviour is unacceptable, and that this type of violence is something which affects the victim deeply.

The spread of the phenomenon of online abuse of girls and women is also contributed by:

- sexism in the media, which contributes to the objectification of women
- advertisements, that often objectify women
- normalization of culture of rape on the Internet
- violent pornography
- men dominate the digital sphere, as developers, ICT experts and others
- a culture of acceptance of violent online behavior (a significant percentage of young girls say that it is normal for them to be abused online, which is, in their opinion, a part of life on the Internet).

An additional reason why this problem should be targeted systematically and continuously is in the fact that a woman is always at risk of becoming a victim again on a new platform, in a new life situation. And that is why the only real solution for combating online violence is prevention and adequate early education so that girls do not become victims later. Because once they become victims, even though the system of suppressing and punishing violence and treating the trauma does its part - the crime itself can still be repeated over and over again online.

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19 European Women’s lobby (2017) #HerNetHerRights Mapping the state of online violence against women & girls in Europe
Girls and boys are particularly unaware, partly due to the lack of health and sex education in school, which ultimately results in distrust toward the system. Research on young people's attitudes towards violence in intimate relationships\textsuperscript{20} has shown that the topic of violence in adolescent relationships, especially online sexual violence, is mostly not covered by professional contact between teachers and students, while children and youth rarely talk about it with their parents. Research on young people's reactions to revenge pornography, i.e. publishing videos/photos of their partner without consent, show that most young people would end the relationship or turn to friends for help, while seeking help from parents, teachers and the police is at the rarely their primer choice.

With little knowledge or understanding of the true nature of the problem, victims face many barriers to getting support, reporting the crime, being taken seriously and recovering from the incident. Although gender-based online violence violates the fundamental rights of many victims and causes a multitude of personal, social, and economic problems, victims are not aware of their rights, nor they are familiar with support services they might use.

There are several issues that contribute to the under-recognition and under-reporting of online violence: the shame of being a victim can prevent women from disclosing their experience; cultural norms sometimes mean that some women are uncomfortable talking about sexual violence in general or see the incidents they have experienced as private matters. Cultural norms also mean that women may have a narrower definition of what can be considered sexual violence, that is, what can be considered as online harassment, online stalking, or other forms of gender-based online violence. As a result, these women are less likely to report incidents in research and to the police, resulting in lower visibility of online violence in official crime statistics.

The tendency of victims’ belief that their experiences will not be taken seriously further contributes to the low number of reports to the police. This can be caused by, among other things, negative experiences with the police or hearing about the difficulties faced by other victims, as well as the desire to avoid aggravating feelings of disempowerment and self-blame. The fact that the police often do not have the tools or adequate training to properly handle such cases can exacerbate these problems. Along with the barrage of online violence that occurs when a victim speaks out against gender-based violence, various forms of cyberbullying, and related issues, reporting gender-based online violence remains to be a difficult, complex process characterized by a lack of transparency, and follow-up action.

Rapidly developing technology, new digital platforms and ways of interaction, possibilities of digital stalking and control and other similar trends lead to increasingly sophisticated modes and forms of gender-based online violence, which makes such violence difficult to recognize, monitor, and report. Internet service providers are usually multinational corporate giants, which are often more powerful than smaller states. A special challenge to combat against online violence is posed the dominant algorithms of large social media, which encourage polarizing comments and content, in order to increase traffic, engagement, the number of users and the amount of content, thereby directly or indirectly contributing to the incitement of hatred, sexism and online violence.

Trends and characteristics of the information use and communication technology that contribute to the spread of gender-based online violence:

- with increased access to the internet and smartphones, online violence is increasing
- anonymity facilitates violence
- free tracking tools, GPS, simplicity of the use of technology allows more people to be abusers
- the focus of internet service providers on profit and their reluctance to remove such content contributes to the spread of online violence

When online violence occurs, the victim can and should be able to report the unwanted behaviour that occurs on a specific platform to administrators of that platform. The website of the Croatian Ministry of the Interior (MUP) has published tips on how to report certain content that has been published on a social network, with the need of removing such content\(^{21}\). When there is a direct threat to life, such as suspicion on suicide or planned murder, or in the case of sexual exploitation of children, then the MUP can request information from platforms at which violence takes place, but they have the discretion to decide whether they will provide that information to the police. More assuring, but much slower way, is via international legal assistance, i.e. issuing a court order. In fact, these platforms mainly have domains in foreign countries, often in the USA, but increasingly in some exotic countries, which makes it extremely difficult to collect and obtain proper data.

A separate and crucial problem with online violence, and especially with the publication of pornography content without consent, lies in the fact that we can never be completely

sure that the content has been completely removed. Once some content is published online, even the person who published it loses control over its further spread. Because of this, online abuse often has more serious consequences for the victim, because she can never be sure that her intimate content will not appear online again and that she will not become the target of new blackmail or abuse. In these cases, victims should contact the police, the platform on which the content was published, as well as the Croatian Personal Data Protection Agency (AZOP), because according to the General Regulation on the Protection of Personal Data (2018)\textsuperscript{22}, they have the "right to be forgotten", i.e. right to ask for content to be deleted.

In the case of discretionary decisions of social networks and portals not to remove disputed content, it is necessary to contact AZOP, which can then reach out the member state in which the platform is registered through available modes and channels and see if there is another way to remove that content. In practice, this content removal mechanism is often quite slow.

Meanwhile, some progress is visible both on content management on domestic portals and on large social media. Completely anonymous comments are no longer allowed on domestic portals as users must log in at least with their profile on a social network. The social networks themselves are under increasing pressure from regulators (especially in the European Union), where they began to make significant efforts to reduce hate speech and online violence. In addition, there are more tools to report and remove existing content, such as stopncii.org, which has a 90 percent success rate in removing non-consensual pornography from the Internet. In Croatia, along with other services, the NEON platform was launched as part of “SURF and SOUND” project, where victims can report violence, get information about online violence, and use free legal or psychological counselling services.

\begin{center}
\textbf{3) LACK OF DATA AND EVIDENCE-BASED ADAPTATION OF THE LEGISLATIVE FRAMEWORK AT THE NATIONAL AND EU LEVEL}
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Even though urgency of action to prevent and suppress gender-based online violence has been recognized by the Council of Europe, the European Union (EU), the United Nations and many European and national institutions\textsuperscript{23}, specific legal EU instrument that deals

\begin{itemize}
\item \textsuperscript{22} EU (2018) Opća uredba o zaštiti osobnih podataka. https://eur-lex.europa.eu/legal-content/HR/TXT/PDF/?uri=CELEX.32016R0679&from=HR
\item \textsuperscript{23} An overview of relevant international documents that provide a legal framework for the protection of victims of violence can be seen in the Code of Conduct in the case of online violence against women, which, like this analysis, was created as part of the project "Surf&Sound - against online violence against women" of the association B.a.B.e.
\end{itemize}
with it still does not exist. The lack of EU legislation dealing with online gender-based violence has resulted in large differences in how member states regulate the issue. Some member states use criminal provisions that are not specific to the Internet sphere to solve the problem. The lack of an online perspective in the existing legislation does not adequately address the problem because such solution does not foresee situations that can only occur online. On the other hand, some member states have specific provisions on violence, but do not have a gender perspective. This does not effectively solve the problem either.

The diversity of national legal approaches without harmonized definitions and legal mechanisms in practice means that the extent to which member states fight gender-based online violence varies significantly, and in some countries victims are completely unprotected. The importance of concerted action by member states to prevent and combat this problem is particularly important due to the cross-border nature of cyber violence. Crimes committed online have the potential to be committed from another country, so a joint approach is essential.

Croatia belongs to the group of countries that do not have a definition of online violence, and such illegal activities are covered by the scope of general criminal offenses. The relevant domestic legal framework for protection against online violence is encompassed by set of criminal, misdemeanour, anti-discrimination, and civil legislation, as well as with the set of regulation on the right to the protection of personal data and fundamental human rights and freedoms. Although the criminal legal framework for the prosecution of online forms of criminal offenses is established through the existing definition of criminal offenses, according to the experiences of the participants to the workshop for professionals held in January 2022 as part of the "SURF & SOUND" project, the encompassment of online type of criminal offenses by the regulation on existing forms of offline of criminal offenses is not an obstacle for the online dimension to appear as a subject of proceedings at the court practice. The fact is, however, that some illegal actions that were usually carried out offline today have their emphasized online dimension, which especially refers to sexual harassment, making threats via the Internet and intrusive behaviour. The EU’s guiding idea for all who act in such cases is that what is illegal offline must also be illegal online.

However, Croatian legislators have made a step forward by introducing the abuse of recorded sexually explicit content in the Croatian criminal code, which is the most

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26 An analysis of domestic documents that provide a legal framework for the protection of victims of violence can be seen in the Code of Conduct in the case of online violence against women created as part of the "Surf&Sound - against online violence against women" project of the association B.a.B.e.
27 Workshop for professionals - multi-sector discussion „System mapping: legal means, investigation procedures and statistical monitoring“ held on January 26, 2022 on the ZOOM platform, organized by the association B.a.B.e. as part of the "SURF&Sound" project
common form of online abuse. Article 144 of the Criminal Code\textsuperscript{28} regulates the misuse of recordings of sexually explicit content using a computer system, including the so-called deepfake, i.e. modification of an existing recording with the addition of another person and its use as a real, original footage. Confiscation of recordings and devices with which a criminal offense was committed is also prescribed. This provision clearly shows that online violence has separate characteristics, which can not always be covered by the existing regulations for offline violence, such as deepfakes or the need to remove shared content, which can not be fully controlled\textsuperscript{29}.

High-quality statistical monitoring and research insights into causes, patterns and consequences are a prerequisite for the appropriate development of the legal and policy framework for combating gender-based online violence. Croatia and EU still do not have enough comprehensive research on the scale of the problem, and statistical monitoring is not satisfactory. While EUFRA data\textsuperscript{30} is used as an important source of comprehensive data in various European Union countries, they only focus on two forms of gender-based online violence and originate from 2012. Furthermore, partly due to the different extent to which forms of gender-based cyber violence can be processed in the member states, crime statistics are often not collected, and even if they are, they are not comparable\textsuperscript{31}.

In the same line, Croatia still needs to develop its information system for electronic monitoring of the court cases progress, the so-called e-File\textsuperscript{32}. The current version of the system indicates criminal and misdemeanor offenses related to application of the Act on Protection Against Domestic Violence. It does so by distinguishing offenses by articles and labels, type of court decision and punishment, while criminal offenses related to gender-based violence, especially not online violence, are yet not included in the list of indicators. Therefore, it is crucial to swiftly improve existing or adopt a new operational procedure\textsuperscript{33} that will govern the process of collecting and processing statistical data related to the application of the Act on Protection Against Domestic Violence. Current operational procedure oblige the police, the state attorney’s office, the court, centers for social welfare, health institutions and educational institutions to send a report to the Ministry of Justice

\begin{thebibliography}{99}
\bibitem{29} Code of Conduct in the case of online violence against women created within the project ”Surf&Sound - against online violence against women” of the association B.a.B.e.
\bibitem{30} EU Fundamental Rights Agency (EU-FRA) (2014) Violence against women: an EU-wide survey – Main Results, Luxembourg: Publication Office of the European Union
\bibitem{31} European Parliamentary Research Service (2021) Combating gender-based violence: Cyber violence
\bibitem{32} According to the experiences of the participants of the workshop for professionals - multi-sector discussion „System mapping: legal means, investigation procedures and statistical monitoring” held on January 26, 2022 on the ZOOM platform, organized by the association B.a.B.e. as part of the “SURF&SOUND” project
\bibitem{33} Currently, the Operating procedures on the method of collection, processing and delivery of statistical data and reports from the area of application of the Act on Protection from Domestic Violence (Official Gazette, No. 31/18) is relevant for this purpose
\end{thebibliography}
through a form for collecting statistical data. These data are collected by the Commission for monitoring and improving the work of agencies mandated with criminal and misdemeanor procedure and with the execution of sanctions related to protection against domestic violence. In line with current operating procedures, the Commission collects and consolidates this data by types of violence, profiles of perpetrators, gender, profiles of victims, etc. Only when operating procedures are updated so to prescribe the monitoring of misdemeanor and criminal acts committed online– it will be possible to analyse trends of growth or decline and to see how many violence reports have resulted in a verdict at the end. It is to be expected that such improved monitoring of online criminal offenses would also create a quality evidence base for better regulation of gender-based online violence.

Of the bodies covered by the procedures, only the Ministry of the Interior currently has an efficient system of statistical monitoring of offenses and criminal offenses committed online for the last three years. That system, however, relies on data entry by police officers, what affects task scheduling and potentially takes valuable time away from criminal investigations and victim protection. In addition, these data are not subsequently tracked elsewhere in the systems (how many police reports resulted in indictments, how many indictments resulted in verdicts, what were those verdicts...). Therefore, what is needed is the necessity of a systematic relationship with these and other important data for the fight against online violence.

4) CHALLENGES IN IMPLEMENTING REGULATIONS, SUPPORT MEASURES AND WORKING WITH (POTENTIAL) PERPETRATORS OF VIOLENCE

Dealing with online violence against women involves the entire spectrum of actors: police, judicial bodies, social welfare centres, health and educational institutions, civil society organizations and the media. The synergistic action of these actors combat various forms of violence in Croatia is determined by the protocols defining on actions in the cases of domestic violence, cases of sexual violence, and the cases of hate crimes. Also, as part of the “SURF and SOUND” project, Code of Conduct for Professionals Working with Cases of Online Violence was developed. The aim of a that document is to provide support to experts who are in contact with victims of online violence, to assist them in fulfilling their role in ensuring the effective prosecution of perpetrators, with an emphasis on a sensitized approach to victims in all stages of the investigation and judicial processes.

When persons are reporting a violence or are seeking information to fill out the report, the first contact with the victim is usually made with police officers. As a result of this contact, the police officers are responsible for a whole series of actions, including assessing the risk to the safety or health of the victim, taking actions with the aim of protection, informing,
and empowering the victim to fill out a report, and acting based on knowledge on the committed violence in accordance with the regulations that frame criminal or misdemeanor prosecution. In communication with the victim, crucial is careful and informative behaviour, insurance of adequate conditions (spatial and human) for giving statements and proactive action in referring the victim to available services and rights. At the same time, in decision-making and the implementation of police action, it is essential to undertake investigative actions and secure evidence comprehensively and urgently, and to proactively act towards the removal of disputed content from the Internet, refer cases for further action to the state attorney’s office, and add information about the reported criminal offense into the statistical monitoring system.

In certain cases, especially when the violence takes place between people close to each other, victims of online violence turn to social welfare professionals who then play a key role in informing the victim on their rights. In a case of threat to safety, social workers have important role in securing victim’s accommodation in a safe house. In addition, when working with families at risk, for example in reconciliation and family therapy procedures or in procedures for determining childcare, it is important to recognize the patterns and consequences of online family violence and create a safe environment in which the victim will be encouraged in reporting of perpetrators, and care for children will be determined by taking into consideration the incidence of this form of violence. Also, professionals at social welfare centres are key actors in the process of reporting violence to the police or submitting a criminal report to the state attorney offices.

The third important group of actors in combating online violence are judicial bodies. It is important that their actions in the implementation of regulations are qualified by appropriate urgency of action, efficient response to victims’ inquiries, and special care about of deadlines (for example, filing an indictment or deciding on a criminal complaint). Also, for the purposefulness of the actions of judicial bodies in criminal proceedings, it is necessary to ensure the voice of the victim in decisions that directly relate to the victim or his/her safety, as well as to avoid actions that may result in further victimization of the victim (for example, repeated questioning before different bodies of criminal proceedings).

These three groups of actors play a key role in the implementation of investigative actions and the protection of victims of online violence 34 . The effectiveness of their actions, however, is often challenged by limited human and material resources and numerous investigative challenges specific to online violence and crime. In international and

34 A detailed presentation of the determinants of the successful work of the key actors of protection against online violence against women can be seen in the Code of Conduct in the case of online violence against women created within the project "Surf&Sound - against online violence against women" of the association B.a.B.e.
Croatian practice, actors in charge of law enforcement face technical and legal obstacles to conducting cross-border investigations in an online environment. As pointed out by Eurojust in its 2019 annual report, the field of cybercrime brings many unique challenges driven by "large differences in national legal frameworks, which were developed with traditional crimes and only existing technologies in mind" and difficulties in accessing, collecting, decryption and efficient sharing of electronic evidence.

An important feature of online violence is that it is significantly less likely to find the perpetrator than in the case of violence committed offline. Crimes related to online violence know no national borders and are often committed by perpetrators whose identities can be highly contested. While Croatian criminal law can in certain cases be applied to foreign nationals, in situations where the perpetrator who is a foreigner is not available to the state authorities, investigation and victim protection needs to rely on international legal aid institutes. According to the experiences of the representatives of these three groups of actors who participated in the workshop for professionals held in January 2022 as part of the “SURF and SOUND” project, cooperation between EU member states through European investigative orders is particularly good, but with some African countries in practice there is no true cooperation. In addition, in cases of online violence, forensics experts cannot be sure of the nature of the crime committed until they see a concrete device and evidence related to the entire case, which is often not possible in cross-border cases. The participants of the workshop for professional emphasized that the additional problem is the limited number of police officers for investigating online crimes.

In addition to the problem of limited human resources and funds, the challenge in European and Croatian practice is the need for constant training of professionals in the police, judicial and social work systems, as well as experts in the health and education systems. Recognizing and acting against newer forms of harassment and abuse requires continuous education for professionals who work in direct contact with (potential) victims and abusers. Also, effective support for victims of online violence implies verbal and non-verbal behaviour free from condemnation or minimization of the harm associated with violence. In practice, however, there is still a lack of adequate support and treatment for the victim. Research at the EU level thus shows that victims are not consistently referred to victim support services, that victims often must report their case numerous times,

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37 Workshop for professionals - multi-sector discussion „System mapping: legal means, investigation procedures and statistical monitoring” held on January 26, 2022 on the ZOOM platform, organized by the association B.a.B.e. as part of the "SURF&Sound" project
which causes additional trauma\textsuperscript{39}, and that a significant proportion of reported cases of online violence against women are not investigated. This is the case due to a lack of physical evidence or failure to recognize an immediate threat to the victim's safety\textsuperscript{40}.

The responsibility of dealing with online violence, gathering evidence, and finding support is therefore placed primarily on the victims, who differ significantly in their level of knowledge on the topic and their ability to act. Victims of online violence, as emphasized by experts participating in the workshop held in January 2022 as part of the “SURF and SOUND” project, are often not sufficiently familiar with the steps they should or could take. For example, the most common form of crime with an online dimension is the abuse of a recording of sexually explicit content, which was recently introduced into the Croatian Criminal Code. Given that this is a novelty, victims often ask the police if they can report criminal offenses that have occurred in the past, where the police inform them that the provision was made pro futuro and applies from the date of its enactment. Also, according to the experiences of the participants of the workshop for professionals held in 2022 as part of the “SURF and SOUND” project, victims are not yet sufficiently familiar with the short deadline for reporting this criminal offense or do not know the steps to effectively document online abuse, such as copying the ID number or username of the offender, instead of the profile name.

In addition to the actors mentioned above, an important contribution to informing and empowering victims of violence is made by civil society organizations that provide psychological and legal support services, ensure the accompaniment of a trusted person when reporting violence or even provide accommodation in safe houses and other social services. The support by civil society organizations is particularly important in familiarization of victims with procedures for action and communication with the authorities, for example when sending written queries to the police about the status of a case after submitting a report. In many situations, civil society organizations act as the victim’s first point of contact with the system, helping them to collect evidence or prepare a description of the sequence of events to make it easier for authorities to manage the case.

Through the synergy of public authorities and civil society organizations in Croatia, several web platforms have been established for reporting electronic violence and providing support to victims. Thus, the Ministry of the Interior offers the possibility to report abuse and harmful content on the Internet through the RED BUTTON platform\textsuperscript{41}. The Center for Missing and Exploited Children also runs the Safer Internet Center, which

\textsuperscript{39} Wheatcroft, J. et al. (2017) Victims’ Voices: Understanding the Emotional Impact of Cyberstalking and Individuals’ Coping Responses. SAGE Open

\textsuperscript{40} Association for Progressive Communications. (2015) Infographic: Mapping technology-based violence against women – Take Back the Tech! top 8 findings

\textsuperscript{41} Ministry of the Interior, Online Application https://redbutton.gov.hr/online-prijava/7
provides a Hotline service for reporting harmful content on the Internet and a Helpline service\textsuperscript{42} for children and parents to report harmful content and receive professional help. Support via a free line is also offered by Hrabri Telefon\textsuperscript{43}, SOS Rijeka\textsuperscript{44}, dom „Duga – Zagreb”\textsuperscript{45} and Udruga za podršku žrtvama i svjedocima\textsuperscript{46}, and within the project "SURF and SOUND", the association B.a.B.e. launched the NEON web platform\textsuperscript{47} for reporting online violence, counseling and information, while offering free legal and psychological service to girls and women victims of electronic violence.

Along with the development of support services for victims of online and offline violence, the EU pays more attention to working with perpetrators of violence. Thus, the European network for the work with perpetrators of domestic violence is developing guidelines for working with this specific target group. When working with perpetrators of violence in Croatia, online violence is a topic that organizations, such as the Society for Psychological Assistance, have yet to include in their work. In doing so, the synergy of system actors is very important (especially judicial bodies that refer perpetrators of violence to psychosocial treatment, together with experts and civil society organizations).

### CONSEQUENCES OF ONLINE ABUSE

A few studies on online violence point to significant consequences for women experienced abuse online. There are a lot of them, but the most worrying is the so-called Silencing effect: 76% of women who have experienced online abuse have changed their behaviour on social media, and 51% are reluctant to participate in discussions. In addition, they are reluctant to create content. 70% of female journalists experienced online violence. In Britain, several parliamentary representatives gave up their re-candidacy because of the frequent online violence they experienced\textsuperscript{48}.

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\textsuperscript{42} Center for a Safer Internet. Helpline http://csi.hr/helpline/ and free calls to the number 0800 606 606

\textsuperscript{43} Hrabritelefon https://hrabritelefon.hr/

\textsuperscript{44} SOS Rijeka https://www.sos-rijeka.org/

\textsuperscript{45} Duga – Zagreb https://www.duga-zagreb.hr/en/home/

\textsuperscript{46} Udruga za podršku žrtvama i svjedocima https://pzs.hr/

\textsuperscript{47} NEON Ne Online Nasilju https://babe.hr/ne-online-nasilju/

\textsuperscript{48} European Parliamentary Research Service (2021) Combating gender-based violence: Cyber violence
Almost a quarter of abused women experienced blaming (secondary victimization). The primary consequences of electronic violence against women are concentration problems, stress, panic and anxiety attacks, reduced self-esteem, withdrawal from the Internet and insecurity in electronic communication. In more severe forms of abuse, such as electronic stalking, victims show increased anxiety and PTSD symptoms, depression, a feeling of helplessness, a pessimistic view of the future, and a lack of self-confidence in the ability to control their own lives. Therefore, abused women and girls often defend themselves by withdrawing from social media and generally reducing social interactions\textsuperscript{49}.

Electronic violence against women and girls has significant economic and social consequences: victims’ productivity decreases and they miss work more often, the risk of job loss increases, and the quality-of-life decreases. They withdrawal from social media is accompanied with decreased opportunities for networking, while their social networking narrows. Victims participate less in public debates and in the democratic arena, the costs of their legal and health protection increase, women’s unemployment increases, and due to reduced income, tax revenues decrease and other negative macroeconomic consequences increase, and the whole society is at a loss due to the ‘silencing’ of women in public space. There are countless other indirect consequences, including family relationships and consequences for their children\textsuperscript{50}.

Finally, according to a 2021 European Parliament report\textsuperscript{51}, the total cost of cyberbullying and stalking of women and girls at the EU level is between 49 and 89.3 billion euros. More than half of that cost refers to the monetized value of the loss in quality of life, while a third of the losses are related to work, mostly due to reduced participation in the labour market.

**FROM PROBLEM TO SOLUTION OPTIONS – RECOMMENDATIONS FOR ACTION**

Based on the analysis of the occurrence, causes, and consequences of online violence against women, in this final chapter we offer set of recommendations for policy making. The recommendations are primarily aimed for public authorities in Croatia. Still, they are

\textsuperscript{49} European Parliamentary Research Service (2021) *Combating gender-based violence: Cyber violence*

\textsuperscript{50} European Parliamentary Research Service (2021) *Combating gender-based violence: Cyber violence*

\textsuperscript{51} European Parliamentary Research Service (2021) *Combating gender-based violence: Cyber violence*
transferable to other national and European actors that work on the prevention and combat against online violence against women. The recommendations in this analysis are based on the classification of public policy instruments - tools used in public policy to solve collective problems and achieve goals.

In this analysis, a simple typology known as "NATO" is used to form policy recommendations, which systematizes public policy instruments into four categories, considering the basic governing resources they use. The government, as the central actor of public policies, can solve social problems using information at its disposal (nodality), legal powers (authority), financial forms of wealth (treasure), or formal organizations at its disposal (organization) 52. Instruments within each category are divided into substantive and procedural ones, with the former directly affecting the achievement of policy goals (for example, an information campaign), while the latter focus on the process of creating public policies (such as a working group for monitoring the implementation of a certain policy).

The design and selection of instruments is a central activity in the formulation of public policies because they determine the ways to achieve goals and implement accepted solutions. To achieve effective action in combating online violence and the protection of victims, we propose a set of 12 policy instruments that combine different governing resources and include substantive and procedural action. The recommendations are systematized into four groups, according to the basic resource on which they rest. Each set of recommendations is introduced with the description of that type of tools based on the literature on public policies. In this way, the recommendations are based on the synergy of theoretical insights in the field of public policies with a practical analysis of the situation and the possibilities of action for combating online violence in Croatia.

**RECOMMENDATIONS BASED ON INFORMATION (NODALITY)**

The first recommended set of policy instruments is based on the use of information available to the government. The most common forms of this group of instruments are public information campaigns, education and persuasion. Through public information campaigns, the government increases the knowledge of social actors so that they can make independent conclusions and decisions about their own behaviour, 'hoping' for a change in the behaviour of individuals or organizations. Persuasion, on the other hand, is a more powerful activity than the mere dissemination of information, with the aim of directly

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influencing the preferences and actions of members of society. For example, in contrast to a campaign that informs citizens about the changes brought about by the adoption of a certain international document, persuasion through public advertising or public appearances by high-ranking officials offers to citizens reasoning on why it is desirable to adopt important conventions or declarations. Education, formal and informal, also belongs to the nodal instruments, as well as the upgrading of existing or the development of new educational materials. Process nodal instruments ensure participatory and transparent design and effective management of the implementation of public policies. The most common forms are the use of benchmarking and performance indicators, and the implementation of monitoring or research on which proposals for policy improvement can be based.

**RECOMMENDATION 1: NATIONAL CAMPAIGN AND TARGETED INFORMATION**

With the aim of raising awareness among the general public, the national campaign would have a wide range of activities including TV spots, posters, brochures, leaflets, events (online discussions and education, information stands, marking key days in various places, street actions and performances, lectures and discussions at universities, as well as in large systems such as companies, institutions and organizations), creation of digital content for the web, social networks and other channels (newsletter, e-mail, infographics, video, online educational materials suitable for sharing via WhastApp, Viber and other chat services, infographics, questionnaires, surveys, quizzes...), paid announcements on important portals, thematic announcements in the media through cooperation with journalists and editors, and digital marketing campaign. In addition to the general population, the campaign would focus on victims (women) of online violence with the aim of empowering and informing the victim about how to recognize violence, the possibilities of reporting and obtaining support. Also, the target group of the campaign would be women (with a special emphasis on women between the ages of 18 and 29, who are at a high risk of online violence), who would be empowered by the campaign to recognize violence, prevent violence, quickly intervene in the event of violence, as well as aid people in their living environment who are potential victims of violence. To achieve a comprehensive effect, the campaign would target abusers and potential abusers with messages aimed at raising awareness, educating and informing, emphasizing criminal responsibility and encouraging empathy. The campaign with these elements is carried out by the association B.a.B.e. and the Agency for Electronic Media within the "SURF and

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RECOMMENDATION 2: TRAINING PROGRAMS FOR PROFESSIONALS COMBATING ONLINE VIOLENCE AND MEDIA PROFESSIONALS

With the aim of strengthening the competences of media professionals for the creation of various forms of media content and empowering professionals engaged in combating online violence, training programs would include the implementation of workshops and the development of informative or educational materials. The goals and activities of the training should be adapted to the context of the professionals’ work and the patterns of their daily activities. It is important to direct workshops for journalists and editors who work in different media forms (press, radio, TV, portals, and social networks) towards empowerment to act on the prevention/removal of violent content as well as to create media content that contributes to public promotes tools for joint action to combat online violence. For experts who work on the implementation of laws relevant to the combating online violence, including police officers, lawyers, prosecutors, judges, social workers and professionals in the health system and civil society organisations that provide support and treatment services to the victim, it is important to focus the training on empowering them to carry out investigative actions, prosecution of perpetrators and protection of victims. For experts who play a key role in preventing online violence and empowering (potential) victims, such as teachers or professional services in the education system, it is important to focus on tools for successful recognition and prevention of violence, early intervention, and support in cases of violence.

RECOMMENDATION 3: EDUCATION FOR MEDIA AND DIGITAL LITERACY OF PUPILS AND STUDENTS

With the aim of preventing online violence and empowering children and young people for safe and responsible activity on social platforms and the Internet, it would be necessary to include elements of media and digital literacy in the teaching curriculum in primary and secondary schools as well as in higher education programs. In cooperation with experts and teachers, it is important to design an effective model of education, either as a separate subject, extracurricular content or as a detailly operationalized cross-curricular topic. In defining the content and pedagogical methods of strengthening media and digital literacy, it is recommended to pay special attention to gender-sensitive training of male
and female students about online violence. It is important that such training effectively provides information to children and teenagers about the risks of creating or allowing others to create intimate recordings as well as information on treating the sharing of such recordings as a form of electronic violence and crime. With such training, it is especially important to effectively teach girls the steps to ensure safety on social platforms and the tools necessary to protect privacy.

**RECOMMENDATION 4: RESEARCHING AND MONITORING ONLINE VIOLENCE**

With the aim of creating a basis for the development of a legislative and policy framework based on knowledge of patterns of occurrence, causes and consequences of online violence, research would be systematically conducted, and the monitoring procedures and tools would be improved. First, to create comprehensive insights as a base for the development of policy measures and laws, it is important to improve the information system for electronic monitoring of misdemeanors and criminal offenses as well as court cases, to adequately cover the topic of online violence. In addition to existing indicators on criminal and misdemeanor offenses related to application of the Act on protection against domestic violence, it is important that criminal offenses are statistically monitored in connection with gender-based violence, especially with online violence. Based on the data collected through monitoring, it is recommended to continuously analyse the patterns and trends of violence occurrence. In addition to monitoring activities, it is important to conduct research or join the initiatives of European institutions such as EIGE, FRA, EUROPOL, and EUROJUST, which would strive to collect comparable data and insights on online violence with the aim of creating an analytical basis for European legislative initiatives.

**RECOMMENDATIONS BASED ON LEGAL POWER (AUTHORITY)**

The second set of instruments derives from the state’s right to enact and enforce laws and other regulations. Legal authority as a set of policy instruments include regulation based on the principle of 'command and control' and delegated regulation. Regulation based on the principle of 'command and control' implies subjecting the target groups to the adopted rules, otherwise the state has the right to apply sanctions. It includes rules, standards, permits, prohibitions, laws and executive acts. Some regulation, such as the prohibition of criminal acts related to offline or online violence against women, takes the form of laws enforced by the police and judicial system. The largest part of regulation is written and
adopted by bodies with regulatory powers, which are then administered by public authorities or agencies with supervisory powers. Regulation also differs in terms of whether it regulates economic or social issues, the latter including issues of health, safety and social behaviour (human rights, discrimination). Another form of authority-based instrument is delegated regulation or self-regulation where the authority allows non-state actors to regulate themselves, for example through licensing activities, quality certificates or codes of conduct. Regulation based on the principle of 'command and control' and delegated regulation represent a substantive form of authority, while the procedural form of this group of instruments refers to advisory committees, working groups or councils, in which the government invites members as representatives of different interest groups or sectors.

**RECOMMENDATION 5: LEGAL FRAMEWORK DEVELOPMENT BASED ON THE RESEARCH AND MONITORING**

With the aim of ensuring the effectiveness of the domestic legal framework, particularly in the light of specifics of gender-based online violence, it is important to use the insights derived from the monitoring and research targeting online violence (Recommendation 4) as a basis for relevant improvements of criminal, misdemeanor, anti-discrimination and civil legislation. Along with the evidence-based development of the domestic legal framework, it is crucial to join international initiatives such as those focusing on development of EU legislation to prevent and combat offline and online gender-based violence. Also, given the international nature of the activities of internet platform providers, it is important to get involved in initiatives focused on improvement of framework for cooperation between platforms and other stakeholders responsible for protecting victims of online violence. This includes efforts toward improved (self) regulation of providers through codes, guidelines and similar forms of delegated regulation. In the same direction, it is important to act proactively and engage in efforts at the international level to improve mechanisms for removing content related to online violence from online platforms.

**RECOMMENDATION 6: DEVELOPMENT OF OPERATIVE PROCEDURES THAT ENSURE THE COORDINATION OF ACTORS COMBATING ONLINE VIOLENCE**

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With the aim of ensuring the synergistic action of key actors for suppression and protection against online violence, it is necessary to develop legal instruments that provide tools and guidelines for mutual coordination and action. According to the examples of the protocols on the procedures in the cases of domestic violence, sexual violence and hate crimes, it is proposed to collaboratively design and adopt a protocol for the procedure in the case of gender-based online violence. The Code of Conduct for Professionals Working with Cases of Online Violence created as part of the project "SURF and SOUND" by B.a.B.e., can serve as a relevant input for this endeavour. Also, to improve the tools and coordination of online violence monitoring, it is important to amend the existing or adopt a new rulebook regulating the process of collecting, processing and delivering statistical data on the application of the Act on Protection against Domestic Violence, in accordance with Recommendation 4.

RECOMMENDATION 7: ESTABLISHMENT OF AN INTERSECTORAL BODY FOR COOPERATION AND COORDINATION OF ACTORS COMBATING ONLINE VIOLENCE

With the aim of achieving effective coordination and cooperation between actors responsible for the implementation of regulations and strategic protection measures against gender-based online violence, a working body to coordinate the development and implementation of the relevant legal and policy framework should be established. Considering the necessity for continuous coordination of the activities between different systems (police, judicial, social, health and educational) as well as the necessity for connecting the efforts by different types of actors (law enforcement public bodies, state agencies and ombudsmen's offices, civil society organizations), it is important to establish a body as a procedural instrument which will act as an organizational platform for presenting the position, informing and coordinating the actions of key actors combating gender-based online violence.

RECOMMENDATIONS BASED ON FINANCES (TREASURY)

The third proposed set of instruments is based on financial resources and the government's ability to collect and distribute funds. It includes financial transfers to individuals, businesses, and organizations, which can serve to encourage or discourage actors. The first subgroup of instruments consists of financial support, which includes
donations, tax credits, loans and others. Donations, at the same time, represent state expenditures with which the state supports an activity or a worthy goal, such as funds given to schools, universities, or civil society organizations. The second subgroup consists of financial disincentives: taxes and fees. Taxes are normally used to collect revenue for government expenditures, but they can also be used as a policy instrument to encourage or discourage desired behaviour. User fees are an increasingly used public policy instrument that sets the price to be paid for certain behaviour. They are most often used for negative externalities, such as the environmental fee, which owners pay when registering a vehicle. Procedural financial instruments refer to the financing of advocacy organizations, the work of interest groups and research-advocacy centers (think-tanks). By strengthening the infrastructure and sustainability of the supported organizations, they are empowered to actively participate in the policy process.

**RECOMMENDATION 8: FUNDING OF PREVENTION AND SUPPORT PROGRAMS FOR VICTIMS OF ONLINE VIOLENCE PROVIDED BY CIVIL SOCIETY ORGANIZATIONS**

With the aim of strengthening the system of support and protection for victims of online violence, it is necessary to develop sustainable programs for financing civil society organizations and institutions that carry out preventive activities and provide services for victims. In order to ensure sufficient and territorially balanced support for victims of online violence, it is essential to develop and establish programs that will provide financial support (open calls) at the national and local level to civil society organizations and institutions that, in various ways (telephone, interaction on internet platforms, in person) provide psychological and legal counseling services and other forms of support for victims of online violence as well as organize training programs for professionals in charge for combating online violence and media professionals. While programming financial support, it is important to encourage territorially balanced availability of services for victims of online violence. Also, when programming financial support, it is important to focus funds on support for prevention and awareness activities at the national level or in local communities.

**RECOMMENDATIONS BASED ON ORGANIZATION**

The fourth proposed set of instruments that is based on the organizational capacities of the government and includes provision of services and goods, either through the direct action of public authorities and public companies, delegation of authority and partnership, or through the promotion of voluntary action by citizens and their organizations. The results of a large part of public policies rest on the direct provision of goods and services by organizational units and employees of public services - police, education, public health services, social services, etc. Partnerships with non-state actors are an increasingly frequent form of this type of instruments and may include subcontracting services through public-private partnerships or delegating government tasks to civil society organizations, most often through open calls for financing activities. While maintaining minimal activity, the government can leave certain tasks to families, local communities, and volunteer and religious organizations; for example, care and nursing for the elderly. In addition to the listed substantive instruments, it can use its organizational resources to accelerate the process of formulation and implementation of public policies. Then the reorganization of government is used as a procedural instrument, which includes the creation of new or restructuring of existing organizational units and public bodies\textsuperscript{56}.

\textbf{RECOMMENDATION 9: STRENGTHENING ORGANIZATIONAL AND HUMAN CAPACITIES IN AGENCIES RESPONSIBLE FOR COMBATING ONLINE VIOLENCE}

In order to foster effective action in ensuring the prosecution of perpetrators while emphasizing a sensitized approach to the victim, it is important to strengthen and specialize organizational and human capacities in the police, judicial system and social welfare system. In addition to empowering professionals in contact with victims of online violence (Recommendation 2), it is important to reflect the growing complexity of the fight against online violence by forming specialized organizational units and increasing the number of officers/professionals in charge of handling cases of online violence. Complexity of simultaneous action in the implementation of investigative, judicial or protective actions, as well as in conducting systematic statistical monitoring of cases should be incorporated in the planning of organizational development and development of human resources in the aforementioned systems.

\textsuperscript{56} Kekez, Anka (2014) Instruments - Nodality, Treasury, Organization and Authority. in: Petek, Ana i Petković, Krešimir (editors) \textit{Key Concepts in Public Policy}. Zagreb: Faculty of Political Science, page 77-83.
With the aim of strengthening and expanding the system of support for victims of online violence, it is necessary, in partnership with civil society organizations, to develop, provide and promote various forms of services and support actions. These service and activities include, but are not limited to: psychological and legal support services, services of ensuring the accompaniment of a trusted person when reporting violence, assistance services in achieving communication with the competent authorities, support in gathering evidence or preparing a description of the sequence of events, accommodation services in safe houses and other social services, and support services from Internet security experts. While it is important to foster all the modes of providing the aforementioned services (telephone, physical or online), services that are provided physically, such as psychological or legal free counseling, should be expanded to all parts of Croatia, because this form of support is invaluable for victims. In the development of the service network, it is essential is to encourage the cooperation of support service providers with schools, universities, companies and other institutions/organizations in the communities because the latter can inform (potential) victims of online violence about the possibilities of free psychological and legal counseling and other forms of support.

To strengthen and expand existing support services for victims of online violence, it is necessary to develop and promote digital support services. Support for victims via online platforms is currently offered by the Ministry of Interior (Red Button), the Center for a Safer Internet and Hrabri Telefon - but all three are primarily focused on helping children, while the association B.a.B.e. through the NEON (NO online violence) platform, explicitly enables reporting, information, exchange of experiences and support for all women victims of violence. Such platforms should be further encouraged and promoted through digital marketing, national campaign and targeted information (Recommendation 1) and in partnership with important actors combating online violence (media, associations, institutions, schools, universities, police, health institutions, psychological chambers, companies...) that could promote these platforms though their websites and other forms of outreach.

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Along with the development of support services for victims of online and offline violence, it is recommended to pay attention to work with perpetrators of violence. It is important to develop guidelines for work and conduct treatment training with perpetrators of online violence through the cooperation of public bodies, especially judicial bodies that refer perpetrators of violence to psychosocial treatment, with experts and organizations that develop programs and train professionals for the psychosocial treatment of perpetrators of violence. Accordingly, it is proposed to systematically encourage the provision of this type of service in different parts of Croatia and at different, appropriately capacitated, types of public and non-governmental organizations.

Summary of recommendations for combating gender-based online violence in Croatia

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<td>1. National campaign and targeted information</td>
<td>5. Legal framework development based on the research and monitoring</td>
<td>8. Funding of prevention and support programs for victims of online violence provided by civil society organizations</td>
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<td>2. Training programs for professionals combating online violence and media professionals</td>
<td>6. Development of operative procedures that ensure the coordination of actors combating online violence</td>
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<td>3. Education for media and digital literacy of pupils and students</td>
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<td>4. Researching and monitoring online violence</td>
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<td>11. Development and promotion of digital platforms for reporting, informing and providing professional support to victims</td>
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<td>12. Development of a psychosocial treatment program for perpetrators of violence</td>
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Selska cesta 112 a
10 000 Zagreb
babe@babe.hr
www.babe.hr