

AI FORENSICS

Networks of abuse, no accountability: frontline workers urge the EU to address Telegram's role in online abuse against women and girls

On April 8th, 2026, the European independent non-profit organisation **AI Forensics** published a report titled "[Harassment As Infrastructure](#)", exposing a large network of more than 25,000 active daily users on Telegram spreading non-consensual sexual material of women, in many cases minors, across Spain and Italy. This case is not isolated nor new: similar networks have emerged in recent years in France, Germany, Portugal, and other European countries, comprising hundreds of thousands of users - what a **CNN investigation** published in March 2026 called "[a global rape academy](#)."

Beyond the sharing of intimate images, these groups routinely engage in doxxing, creating and disseminating deepfakes, cyberstalking, coordinated harassment campaigns, and "spy cam" crimes, targeting women and girls with digital violence on an unprecedented scale. The investigation sheds light on a deeply urgent issue: the rapid growth of technology-facilitated gender-based violence and the central role digital platforms play in mediating, and often amplifying, this type of abuse that now affects millions of women across Europe. While global surveys suggest that 58% of women and girls have experienced some form of harassment on social media, **one in ten women in Europe have suffered the non-consensual sharing of intimate images**, and providers of intermediary services like Telegram have become key mediators of a gendered ecosystem of digital violence that the EU can and must shut down.

AI Forensics's research is particularly significant for documenting how this **abuse is networked, organised, and monetised on Telegram**, both by its users and through its services, including paid access to channels, the use of Telegram's premium features to organise abusive content, and the embedding of nudifying bots within groups.

In response to the report's publication, rather than offering an explanation or a willingness to collaborate on harm mitigation, Telegram CEO [Pavel Durov accused](#) the European Union of **using NGOs and media outlets to justify increased surveillance and censorship**, directly attacking the European Commission as well as the independence of AI Forensics. His statement on X was amplified by other major tech figures, including Elon Musk, who has repeatedly demonstrated hostility toward European institutions and the Digital Services Act (DSA). Durov's public response signals a deliberate stance of regulatory resistance, not mere inadvertent non-compliance, and further strengthens the case for urgent enforcement action. It also illustrates a broader pattern of frequent and repeated attacks by Big Tech companies against independent civil society organisations and researchers working in the field of civil rights, alongside a growing resistance to public scrutiny.

We, the undersigned organisations and individuals working on the front lines, commend this report for exposing the mechanisms we witness daily, and the profound

distress victims endure, as they confront relentless, platform-enabled sexual violence with little to no accountability. **Digital sexual violence is not a matter of free speech.** As a coalition of European NGOs and individuals working at the intersection of digital rights and women's rights - bringing together tech researchers, legal advocates, feminist technologists, and survivor organisations, and most importantly, **people confronting Telegram's complaisance to react against the worst abuses on its platform**, we urge EU institutions to take immediate and concrete action to defend women's lives, safety, and fundamental rights.

The evidence of abuse is no longer in dispute.

AI Forensics has documented what survivors and civil society organisations have reported for years: that Telegram hosts and facilitates networks of gender-based abuse on a massive scale, in open violation with EU law, including not only the Digital Services Act but also the AI Act, the Directive (EU) 2024/1385 combatting violence against women and domestic violence, and the Directive 2011/93/EU on combating the sexual abuse and sexual exploitation of children and child pornography. Large communities of this scale should not be treated as "private groups" exempt from oversight. What is now in question is whether EU institutions are willing to use the powers they already hold instead of using non-VLOP status as a shield against responsibility.

We therefore urgently call on the European Commission to:

- 1. Determine the legal qualification of Telegram.**

We recommend that Telegram should be designated as a Very Large Online Platform, similar to WhatsApp's designation in January 2026, triggering the due diligence obligations that this designation entails without delay. Designation would immediately subject Telegram and, more precisely, its features that allow users to disseminate information to a broad audience, to mandatory risk assessments, including specific assessment of systemic risks related to gender-based violence, independent audits, notice and action mechanisms, and enhanced transparency obligations. The Commission already has the legal authority to act on its own initiative; what is missing is the will to use it. We emphasize that any solution should ensure that truly private messaging functionalities are explicitly exempted from content moderation requirements or third-party interventions, in recognition of the fundamental democratic value of confidential communications. At the same time, legislators should establish clear legal criteria for classifying semi-public spaces within messaging applications like Telegram - that, while formally private in nature, operate at a scale or openness that may give rise to public harms - in order to determine where platform accountability obligations appropriately apply.

- 2. Mandate Telegram to ban nudifying bots** on its app, in keeping with the European Parliament's stand on banning AI systems that produce non-consensual intimate images that can be used for harassment, abuse, and serious violation of women's privacy and dignity.

We also ask EU Member States to:

3. **Activate cross-border enforcement coordination between national Digital Services Coordinators across the affected Member States.**

The AI Forensics dataset constitutes concrete, documented evidence of systemic failure and should be treated as actual knowledge. The investigation should specifically examine whether Telegram's features - including premium access to abusive channels and nudifying bots integrated into groups - constitute a structural facilitation of illegal content. Given the cross-border nature of these abuse networks, coordinated enforcement action is essential. The national Digital Services Coordinator of Belgium and those of the countries where abuse networks have been documented should formally coordinate under the DSA's enforcement cooperation framework to investigate Telegram's conduct, share evidentiary datasets, and pursue joint enforcement action where applicable. As part of this process, national DSCs should exercise their powers under the DSA to require Telegram to promptly remove illegal content targeting women, ensuring that existing legal instruments are enforced effectively, and that online spaces are made safe and accountable. This cross-border coordination is precisely what the DSA's architecture was designed to enable, and must now be activated.

4. **Transpose Directive (EU) 2024/1385 on combating violence against women and domestic violence into national law** as a matter of urgency. This includes implementing its provisions on four forms of cyberviolence, which require specific legislative and enforcement measures to ensure effective protection for victims.

And finally: hold Telegram accountable.

These are not new legislative demands: they require no new law and no new mandate. They require only that existing law be applied to and enforced on large but opaque providers like Telegram, with the urgency that thousands of daily abusive exchanges demand. This begs the question of whether the DSA's 45 million monthly active user threshold is still fit for purpose.

Silence is not a neutral position. Every day without enforcement is a day Telegram's architecture of abuse operates with EU institutional inaction. Every single day without enforcement is an extra day for the abuse to grow and target more women and girls.

We, frontline workers, can no longer accept this situation, and we cannot continue to protect women and girls - victims of Telegram's abuse - while we ourselves work without any protection or institutional support.

Protection is not only a core fundamental right for women and girls. It is also a core fundamental need considering the growing emergency we are facing at a European scale.

We call on the European Parliament, the European Commission, and national Digital Services Coordinators to make clear, through action, that they will not accept it either.

Signatures

NGOs and networks:

AI Forensics, France, Europe

Centar za građanske inicijative Poreč, Croatia

Safe Places, Croatia

Politiscope, Croatia

Point de Contact, France

#StopFisha, France

VsCyberH - Féministes Contre le Cyberharcèlement, France

bff - Frauen gegen Gewalt e.V., Germany

HateAid, Germany

Institute for Strategic Dialogue (ISD), Germany, UK, Global

Lie Detectors, Germany, Austria, Belgium, Luxembourg, Poland, Switzerland

Homo Digitalis, Greece

APS Oltre, Italy

Associazione Centro Donna Lilith Aps, Italy

Associazione Differenza Donna APS, Italy

Casa Internazionale delle Donne, Italy

Centro antiviolenza Ipazia di Siracusa, Italy

Chayn Italia, Italy

Collettiva Aps, Italy

Collettivo CLARA, Italy

Cooperativa Eva, Italy

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Period Think Tank Aps, Italy

Privacy Network, Italy

Sud Est Donne Aps, Italy

TERNI DONNE APS, Italy

Una Nessuna Centomila Foundation, Italy

Bridges2Health&Rights MTÜ, Malta, Italy

Center for the Study of Organized Hate, Netherlands

Diaspora in Action for Human Rights and Democracy (DAHRD), Netherlands

European Fem Institute, Poland

Panoptikon Foundation, Poland

Associação Não Partilhes, Portugal

Center for Digital Ethics, Serbia

Alia, associació de dones per la recerca i acció, Spain
Associació Drets Sexuals i Reproductius, Spain
Dones Juristes, Spain
Decidim, Spain
Fundación Maldita.es, Spain
LA NUESTRA, Spain
Chayn, UK, Global
Glitch, UK
People vs Big Tech, UK, EU
New School of the Anthropocene, UK
Convocation Research + Design, UK, EU and North America
CFWIJ- Coalition For Women In Journalism, Italy, Spain, France, Germany, Portugal, UK
Digital Intimacy Coalition, Pan-European
European Sex Workers Rights Alliance, Pan-European
Avaaz Foundation, Global
Equality Now, Global
Reclaim Coalition, Global
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