Submission to the Meta Oversight Board
Case: 2026-043-FB-UA
AI-Generated Video of Female Campaigner
Author: Charlotte Manson, City Law School
July 2026

I. Introduction

1. This public submission is in response to Case 2026-043-FB-UA, AI-Generated Video of Female Campaigner. It aligns with the public commentary submitted by the Center for Reproductive Rights.
2. It is recognised that while the Board has selected the review of this case, which has the potential to affect many users around the world, this is by no means a fully representative case. The diverse range of challenges facing women and girls globally across the online-to-offline continuum cannot be reduced to a single case.
3. However, the selection of this case does allow for commentary on a range of salient issues on the rights of women and girls under international human rights law (IHRL). The author welcomes the opportunity to provide this public commentary.
4. It also enables a focus on the specific challenges and intersecting barriers facing human rights advocates, defenders (HRDs) activists, and organisations, who are non-public figures; the prevalence and compounding impact of technology-facilitated gender-based violence (TFGBV); the challenges of ubiquitous social media platforms, artificial intelligence, including generative AI (GenAI) and related digital technologies and the enjoyment of human rights.

II. Normative framework

5. This case engages the interdependent and interrelated nature of human rights, particularly of women and girls, and core principles of IHRL.
6. The 1993 Vienna Declaration and Programme of Action (VDPA) established that 'all human rights are universal, indivisible and interdependent and interrelated'.[1] Following this normative expansion in IHRL, it is held that one set of rights cannot be enjoyed fully without the other.[2] Indeed, the VDPA stipulated that the international community must treat human rights globally in a fair and equal manner, on the same footing, and with the same emphasis. [3]
7. With respect to women's and girls' rights, IHRL jurisprudence recognises that women's right to a life free from gender-based violence is indivisible from and interdependent on other human rights, including the rights to life, health, liberty and security of the person, equality and equal protection within the family, freedom from torture, cruel, inhumane or degrading treatment, and freedom of expression, movement, participation, assembly and association. [4]
8. The right to sexual and reproductive health is an integral part of the right to health under article 12 of the International Covenant on Economic, Social and Cultural Rights (ICESCR).[5] It is also reflected in other international human rights instruments. [6]

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[1] United Nations Vienna Declaration and Programme of Action World Conference on Human Rights, A/CONF.157/23, 12 July 1993, Article 5.
[2] Office of the UN High Commissioner for Human Rights https://www.ohchr.org/en/what-are-human-rights
[3] VPDA supra note 1; While Article 5 of VPDA has sparked a lively academic debate in human rights law scholarship, the focus and scope of this submission is on IHRL jurisprudence, standards, norms and principles with relevant to the case.

[4] UN Committee on the Elimination of Discrimination against Women (CEDAW) General Recommendation No. 35 on Gender-Based Violence Against Women, Updating General Recommendation No. 19' (26 July 2017) UN Doc CEDAW/C/GC/35 para 15.

[5] UN Committee on Economic, Social and Cultural Rights (CESCR), General Comment No. 22 (2016) para 1.

[6] See Convention on the Elimination of All Forms of Discrimination against Women, article 12; Convention on the Rights of the Child, articles. 17, 23-25 and 27; Convention on the Rights of Persons with Disabilities, articles. 23 and 25. See also Committee on the

9. The right to sexual and reproductive health entails a set of freedoms and entitlements. General Comment 22 of the UN Committee on Economic, Social and Cultural Rights (CESCR) stipulates that the 'right to sexual and reproductive health is also indivisible from and interdependent with other human rights. It is intimately linked to civil and political rights underpinning the physical and mental integrity of individuals and their autonomy, such as the rights to life; liberty and security of person; freedom from torture and other cruel, inhuman or degrading treatment; privacy and respect for family life; and non-discrimination and equality.'[7]
10. The right to sexual and reproductive health involves various elements, including 'information accessibility', which includes the right to seek, receive and disseminate information and ideas concerning sexual and reproductive health issues generally, and also for individuals to receive specific information on their particular health status'[8] which are integral to this case.
11. The approach of the Inter-American Court of Human Rights (IACtHR) in *I.V. v Bolivia* demonstrates a relevant examination of the interdependency and interrelatedness of rights relating to the right to sexual and reproductive health.[9] In this case, the Court found a violation of multiple rights, and 'in so doing was able to construct a fuller picture of the harm to the applicant, and to set out how the engaged rights related to each other in the context of sexual and reproductive health and informed consent'. [10]
12. This case also engages the rights to freedom of peaceful assembly and of association enshrined in article 20 of the Universal Declaration of Human Rights (UDHR) and articles 21 and 22 of the International Covenant on Civil and Political Rights (ICCPR).
13. Therefore, while previous Board decisions foregrounded the right to freedom of expression under Article 19 of the ICCPR, the author urges the Board to ensure a balanced approach to all human rights in this case and in all future decisions, grounded in Article 5 of the VPDA and broader IHRL jurisprudence as outlined.
14. Finally, the UN Guiding Principles on Business and Human Rights, establish the responsibility of private sector actors – including AI developers and technology companies – to respect human rights and provide access to remedy across their operations and value chain.[11]

III. The prevalence and impact of AI-generated content that mocks or harasses people, especially targeting women and girls participating in public discussions or engaging in human rights advocacy when they are not public figures.

15. As the UN Working Group on discrimination against women and girls (WGDAWG) recently reported, 'AI and related digital technologies are reshaping the conditions under which women and girls exercise their human rights, often in ways that entrench discrimination, exclude marginalised groups and amplify existing power asymmetries'. [12]

Elimination of Discrimination against Women general recommendation No. 24 (1999) on women and health [paras 11, 14, 18, 23, 26, 29, 31 (b); and Committee on the Rights of the Child general comment No. 15 (2013) on the right of the child to the enjoyment of the highest attainable standard of health.

[7] CESCR GC 22, supra note 5, para 5.

[8] CESCR GC 22, supra note 5, paras 18-19.

[9] Case of *I.V. v Bolivia* Inter-American Court of Human Rights Series C329 (2016).

[10] Mahar, Ronit and Murphy, Daragh, 'Rethinking international human rights law's approach to identity in light of surveillance and AI' *Human Rights Law Review* Vol. 25 Issue. 3 (2025) 18.

[11] Report of the UN Working Group on discrimination against women and girls 'Women's and girls' rights and artificial intelligence and related digital technologies' A/HRC/62/48 (18 May 2026) para 9.

[12] Report of the UN Working Group on discrimination against women and girls supra note 11, para 59.

16. TFGBV does not exist in a vacuum: these forms of gender-based violence compound existing patterns of discrimination. This is particularly true for women and girls who face 'intersecting forms of discrimination on the basis of race, ethnicity, socioeconomic status, age, disability, immigration status, sexual orientation, gender identity and other aspects of status or identity'. [13]
17. TFGBV does not exist in isolation either. The blurred lines between and across the online-to-offline continuum do not constitute a neat, binary distinction. The WGDAWG stressed that TFGBV is not an 'isolated set of online abuses, but a structural tool of discrimination that restricts women's and girls' participation in public, political and civic life. Deterring and driving women and girls out of digital spaces, WGDAWG concluded that TFGBV threatens their human rights contrary to the requirements under article 19 of ICCPR and article 7 of the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW).[14]
18. The prevalence and impact of TFGBV through GenAI extend far beyond public figures. For women human rights activists, advocates, defenders, and civil society the 'convergence of technologies such as spyware with AI is becoming an omnipresent risk'. Indeed, when 'adopted in these ways, AI impedes women's full realisation of their rights' as guaranteed under international law.[15]
19. Human rights advocacy, civic and political activism are often used as an opportunity for extended surveillance. AI-facilitated surveillance technologies are often 'weaponised to target women and girls who do not conform to patriarchal gender norms with regard to dress codes expression or public or political engagement'.[16]
20. Women, girls and others facing discrimination and gender-based stigmatization, including LGBTQI+ persons are also more likely to be targeted on account of their public activism. The impact on these groups is even more severe and lasting owing to their gender and the additional stigma that they face in society. [17] TFGBV and harassment add a further layer of challenges to girls' and young women's activism, as they face increased risks of harassment and violence when engaging on themes related to gender equality. [18]
21. The UN Special Rapporteur on the rights of freedom of peaceful assembly and of association documented that digital surveillance impacts on the rights to freedom of peaceful assembly and of association, and that the 'surveillance-related chilling effects on public freedoms simultaneously affect a range of interconnected and interdependent rights, causing compound harm'.[19]
22. The harms and impact of TFGBV, such as digitally manipulated imagery or videos of a targeted individual, often extend to a group and wider community, undermining multiple human rights and weakening inclusive participation in public life through this chilling effect. [20]

IV. Barriers women and girls face in sharing or accessing reproductive health information on social media platforms.

23. This submission supports and echoes the submission of the Center for Reproductive Rights.

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[13] Supra note 11, para 2.
[14] Supra note 11, para 49.
[15] Supra note 11, para 27.
[16] Supra note 11, para 55.
[17] Report of the Special Rapporteur on the rights to freedom of peaceful assembly and of association 'Protecting the rights to freedom of peaceful assembly and of association from stigmatization', A/79/263 (31 July 2024) 5.
[18] Supra note, para 49.
[19] Report of the UN Special Rapporteur on the rights to freedom of peaceful assembly and of association, 'Unmasking the chilling effects of the digital surveillance ecosystem: the erosion of assembly and association rights', A/HRC/62/45 (21 April 2026) para 1.
[20] Supra note 11, paras 48 to 52.

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V. The suitability of the requirement that victims must self-report.

24. Meta has confirmed to the Board that the woman depicted in the video of this case did not report the post herself, which is required to trigger consideration for removal.
25. In the recent case 'Reported AI-Generated Sexualised Video' the Board issued a series of recommendations to Meta, for example, allowing users to designate 'connected accounts' such as trusted friends, family members or associates who can report on their behalf potential violations of a particular community standard. [21]This is a welcome first step and ensures consent, privacy, dignity and agency of the victim(s)/survivor(s).
26. Yet referral and reporting pathways and processes must consider diverse realities for women and girls globally. The author urges a comprehensive, global review of barriers to reporting, which include, inter alia, women and girls in conflict-affected, humanitarian, transitional and authoritarian contexts.
27. This is particularly salient in jurisdictions and contexts where women and girls face systemic, intersecting inequalities and discriminatory laws, with no access to justice and/or effective redress mechanisms.
28. Trust is a central factor in any self-reporting requirement to be effective. Victims/survivors may be reluctant to report TFGBV to the same platform where the digitally manipulated imagery or video is hosted, particularly where they lack confidence that their privacy, anonymity and safety will be protected.
29. For women and girls faced with a repressive, state-controlled media and digital environment, the barriers to self-reporting are heightened, while internet shortages, blackouts or poor connectivity and/or restrictions of personal access to smartphones may be highly curtailed in systems of gender-based discrimination, oppression, and domination.[22]
30. In this regard, women and girls often face a double-edged sword with social media platforms and artificial intelligence. The same platforms and technology they use to access sexual and reproductive health information are often used for extensive surveillance, targeted harassment and weaponised disinformation.
31. Moreover, 'States increasingly deploy AI-driven tools, such as facial recognition technology and predictive behaviour modelling, to monitor their populations and to repress dissent before, during and after armed conflict. Generative AI technologies and other forms of digital violence, such as doxing, have been weaponized to target and silence women journalists, human rights defenders, peacebuilders and survivors of sexual violence and abuse. Disinformation, including AI-generated deepfakes, is further used to incite violence, stoke intergroup tensions and blackmail survivors and families.'[23]
32. Another element of the distrust towards platforms – and thus self-reporting – are the 'colonial dynamics in technology and digital tools continue into the present and the "extraction of data from the so-called global South to the global North' including over 40+ million health data points harvested by private companies.'[24] The absence of consent and redress in these instances may exacerbate the barriers to self-reporting, particularly in instances of TFGBV.

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[21] https://www.oversightboard.com/decision/ig-4ueqal8u/

[22] See for example, Report of the UN independent international fact-finding mission on the Islamic Republic of Iran, A/HRC/61/60 (10 March 2026); UN Special Rapporteur on the situation of human rights in Afghanistan, Report on women's and girls' right to health in Afghanistan, A/HRC/61/63 (23 February 2026).

[23] Supra note 11, para 37.

[24] Report of the UN Special Rapporteur on the right of everyone to the enjoyment of the highest attainable standard of physical and mental health 'Digital innovation, technologies and the right to health' A/HRC/53/65 (21 April 2023) para 26.

33. With regard to information accessibility under the right to sexual and reproductive health, the UN Special Rapporteur on the right to health has also underlined that generative AI can 'advance health, equity and inclusion when accompanied by robust privacy, confidentiality and integrity protections'.[25]
34. AI and digital technologies can also be 'particularly effective in addressing barriers to access of vital health information, improved diagnosis, interventions and expanded access to telemedicine,' particularly in rural, hard-to-reach, and conflict-affected communities.[26] Digital technology has equipped young people, who had previously experienced discrimination in the health sector due to age, adolescent sexual activity or sexual orientation, with anonymous access to HIV and sexual and reproductive health information. [27]
35. Yet conversely, 'intrusive data practices and weak confidentiality can lead to the criminalisation or stigmatisation of individuals and can undermine dignified access to care'.[28] Such outcomes can exacerbate the risks of and barriers to any self-reporting requirement.
36. Given the scale of cases presented to the Board on Meta-hosted platforms and the potential unviability of individual case review, this submission proposes adopting key principles of IHRL including non-discrimination, inclusion, meaningful participation, accountability, substantive equality, transparency and oversight. [29]
37. Finally, the interdependency and interrelatedness of rights, principles of non-discrimination and substantive equality are integral to ensuring robust human rights and gender-responsive assessments are undertaken in the context of the Board's decision, leaving no one behind.

VI. Note on the author

38. This public comment was issued by Charlotte Manson, PhD Researcher at City Law School. Her doctoral research sits at the intersection of international human rights law, feminist legal theory and platform governance/online safety. For over a decade, she has worked on women's rights, gender justice and broader international human rights law issues at the multilateral, regional and national levels. She was recently appointed an Anthony Lester Fellow in Human Rights by Bard College.

[25] Report of the Special Rapporteur on the right of everyone to the enjoyment of the highest attainable standard of physical and mental Health 'Health as an enabler of dignity' A/HRC/62/66 (23 April 2026) para 32
[26] Supra note 11, para 24.
[27] Supra note 24, para 31
[28] ibid.
[29] Supra note 11, para 17.