Proposal Evaluation Form

	EUROPEAN COMMISSION Citizens, Equality, Rights and Values Programme (CERV)	Evaluation Summary Report

Call: CERV-2024-DAPHNE

Type of action: CERV-LS

Proposal number: 101195074

Proposal acronym: PICTURE

Duration (months): 36

Proposal title: Preventing Image-based sexual abuse in Cyberspace Through Understanding, Research, and Education

Activity: Long-term transnational actions

N.	Proposer name	Country	Total eligible costs	%	Grant Requested	%
1	VRIJE UNIVERSITEIT BRUSSEL	BE	398,022	23.74%	398,022	23.74%
2	UNIVERSITEIT LEIDEN	NL	295,276	17.61%	295,276	17.61%
3	UNIVERSIDAD COMPLUTENSE DE MADRID	ES	185,054	11.04%	185,054	11.04%
4	ALMA MATER STUDIORUM - UNIVERSITA DI BOLOGNA	IT	155,836	9.30%	155,836	9.30%
5	CENTRO REGIONALE INFORMATION E COMMUNICATION TECHNOLOGY SCARL	IT	297,706	17.76%	297,706	17.76%
6	GLOBAZ, S.A.	PT	123,428	7.36%	123,428	7.36%
7	VILNIAUS UNIVERSITETAS	LT	80,312	4.79%	80,312	4.79%
8	TALLINNA TEHNIKAÜLIKOOL	EE	75,555	4.51%	75,555	4.51%
9	MITTETULUNDUSUHING ELULIIN	EE	28,079	1.67%	28,079	1.67%
10	MOTERU INFORMACIJOS CENTRAS ASOCIACIJA MIC	LT	37,255	2.22%	37,255	2.22%
	Total:		1,676,523		1,676,523	

Abstract:

Image-based sexual abuse (IBSA) represents a novel yet profoundly entrenched form of sexualised and gendered harm, manifesting from persistent subordination and systemic violence against women, transposing these social dynamics into cyberspace. Research has shown that IBSA inflicts significant harm, often spilling over into victims' offline lives. Despite this, socio-legal awareness remains insufficient, leading to several concerning outcomes: individuals minimising their experiences as IBSA victims, societal trivialisation of these experiences, and limited access to support services addressing IBSA.

Although legal reforms are gradually unfolding, notably with the upcoming European Commission Directive on violence against women and domestic violence aiming to harmonise the criminalisation of IBSA partially, and the recently enacted Digital Services Act, various stakeholders tasked with addressing this issue struggle to provide responses that authentically reflect victims' experiences and are devoid of victim-blaming.

Against this backdrop, the PICTURE project aims to comprehensively combat IBSA by advancing legislative and policy discourse, conducting unique research on its underlying factors, consequences, and responses, enhancing educational efforts, strengthening professional training, improving victim support through a user-friendly chatbot, and raising social awareness through tailored communication strategies.

Evaluation Summary Report

Evaluation Result

Total score: 84.00 (Threshold: 70)

Criterion 1 - Relevance

Score: **35.50** (Threshold: 25 / 40.00 , Weight: -)

The following aspects have been taken into account:
- extent to which the proposal matches the priorities and objectives of the call (0-10 points)
- clearly defined needs and robust needs assessment (0-10 points)
- clearly defined target group, with gender perspective being appropriately taken into account (0-5 points)
- contribution to the EU strategic and legislative context (0-5 points)
- potential to develop mutual trust/cross-border cooperation (0-3 points)
- European/trans-national dimension; impact/interest for a number of countries (EU or eligible non-EU countries) and possibility to use the results in other countries (potential for transfer of good practices) (0-4 points)
- building synergies and avoiding duplication with projects (0-3 points).

The project focuses on image-based sexual abuse (IBSA), which aligns well with the call for proposals as it addresses a specific type of gender-based cyber violence. This focus is considered highly relevant, especially given the emerging manifestations like "deepfakes," which require further development. Further, (IBSA) is not adequately addressed in the current European legislation, and the project's plans for long-term transnational actions at the European level make it highly relevant.

The needs assessment is thorough, using reliable sources and the latest research to highlight gaps in knowledge and legislation related to IBSA. It effectively explains the issue and identifies relevant needs, supported by the applicants' research. However, it lacks a contextual review specific to the countries of implementation, potentially overlooking national or regional specifics. While the gendered nature of IBSA is addressed, other aspects of the needs assessment with potential gender dimensions are not considered.

The proposal identifies four relevant target groups, including potential victims of image-based sexual abuse (IBSA) and key stakeholders, but their definitions are vague and lack clarity. Civil society organizations, in particular, need more detailed profiling and analysis. The broad term "prospective victims and bystanders" also lacks precision, making it difficult to tailor project actions. While gender is not explicitly addressed in the target group definitions, the project does acknowledge elsewhere that women are disproportionately affected by IBSA.

The project is likely to contribute significantly to the implementation of key European Union laws and policies, particularly the Directive on combating violence against women and domestic violence, and the Digital Services Act. The project's focus on advancing social and legal knowledge around image-based sexual abuse aligns closely with these directives, addressing gaps in current legislation.

The project involves activities across 7 European countries and is supported by the cooperation of 9 partners from different EU member states. Its methodology is designed to promote intensive collaboration on common tasks, processes, and deliverables. This approach is expected to significantly enhance mutual trust among stakeholders and improve cross-border cooperation. Additionally, by developing international tools to address IBSA, the project has the potential to strengthen collaboration between EU member states in tackling this issue.

The project addresses a relatively novel but universal issue, IBSA, which is likely to interest stakeholders across Europe. Its goal of producing EU-wide comparative research on legislation and policy related to the transposition of the Directive on combating violence against women and domestic violence holds clear potential for impact at the European level. While the project is expected to generate good practices, its major investment—the chatbot—may not be directly transferable to other countries, as it will need to be adapted to national datasets and procedures. Nonetheless, the project has the potential to generate new knowledge and practical tools, addressing cross-border challenges and contributing to a transnational impact, supported by strong EU networks.

The project is well-positioned within the context of previous initiatives, with a strong focus on building synergies and leveraging existing resources. It consolidates knowledge from projects like FAST-LISA, which uses AI in the field of hate speech, demonstrating that it effectively builds on past efforts and avoid duplications.

Criterion 2 - Quality

Score: **33.50** (Threshold: 0 / 40.00 , Weight: -)

The following aspects have been taken into account:
- clarity and consistency of project (0-5 points)
- methodology for implementing the project is robust, clear, feasible and well chosen for the objectives of the project with gender perspective being appropriately taken into account; feasibility of the project within the proposed time frame; there are logical links between the identified problems, needs and solutions proposed (logical frame concept) (0-5 points)
- consortium and project teams have sufficient capacity to implement the proposed project (0-5 points)
- organisation of work, timetable, allocation of resources and distribution of tasks between partners is appropriate for the activities planned (0-5 points)
- risks are identified appropriately & risk management, monitoring and evaluation are well thought (0-5 points)
- ethical issues and compliance with EU values are addressed (0-5 points)
- financial feasibility (sufficient/appropriate budget for proper implementation) (0-5 points)
- cost-effectiveness (best value for money) (0-5 points)

The proposal is very well-prepared. It is consistent and clearly presented. The objectives of the projects are clearly described, and they translate into activities, some of them very innovative. The proposed activities are clearly planned, and they translate into measurable deliverables.

The project presents a clear and sensible methodology, but it lacks cohesion between the different work packages. While it is stated that research from Work Package 2 will inform the rest of the activities, the relationship between these elements is insufficiently explained, particularly regarding the chatbot development in Work Package 4. The process planned for the chatbot is disconnected from the research, and the justification for using a chatbot to provide "psychological and legal support" for victims of violence is not convincingly addressed. Although ethical and safeguarding measures are included in Work Package 5, the question of whether a chatbot is the most suitable tool remains unresolved, raising concerns about the appropriateness of this intervention. The project ensures target group participation, including testing the chatbot, and access to most target groups is supported by several letters from stakeholders. However, access to the target groups in Work Package 3, focusing on education and training, is not clearly described, and the target groups for these tasks are vaguely defined, making it unclear how they will be reached.

The consortium demonstrates exceptional capacity in managing international projects, conducting research and analytical activities, and applying information technology, including artificial intelligence. Additionally, there is strong expertise in gender equality and combating gender-based violence, particularly image-based sexual abuse (IBSA). The involvement of different departments across partnering universities is positively noted, as it brings an intersectional approach to the project. The partners and team members possess diverse expertise and experience necessary to implement the proposed actions, and they have a proven track record in executing EU-funded programs.

The work of the project is organized in logical work packages, which include relevant tasks, milestones and deliverables. The distribution of tasks across the partnership is done with precision and all partners contribute meaningfully to the project. The timeline is feasible and spreads the project activities logically within the project's 36 months duration. Sufficient management, decision-making and problem-solving mechanisms are in place. The proposed structure and procedure is appropriate to the size of the partnership and the complexity of the project.

The applicants present a strong and relevant risk assessment, identifying both in-partnership management and contextual risks, with appropriate, if somewhat generic, mitigation measures. However, there is insufficient detail regarding periodic reporting within the partnership and data collection for monitoring purposes. Given the size of the partnership, a more concrete plan for monitoring and early risk detection would be beneficial. Additionally, the risk assessment lacks sufficient reflection on the ethical considerations of the chatbot and AI tools. The evaluation strategy is robust, including an external body that will scientifically follow and evaluate the project at different stages.

The applicants clearly address ethical issues, including gender, intersectional dimensions, and data protection, aligning their work with EU values. The project commits to non-discrimination and includes ethical considerations around research and data management. A key strength is the dedicated work package (WP5) focused on monitoring ethical compliance during project implementation. While the commitment to gender mainstreaming is consistently emphasized, specific measures for addressing these challenges are not fully outlined. Ethical concerns regarding the use of AI are discussed, with safeguards and adherence to the EU Artificial Intelligence Act in place. However, the critical ethical question of outsourcing sensitive victim support to AI is not addressed.

The project's budget is feasible for the scale of activities proposed. While the overall budget is high, it aligns with the planned intervention and the distribution of resources generally reflects the roles of the partners. The costs for management and coordination are well-balanced, representing 10.4% of the total budget, which is reasonable. However, some rates, such as those for project managers in Belgium and Italy, are higher than typical when compared to benchmarks like the Horizon dashboard. Despite this, the budget remains adequate for the activities, and the allocation of funds is aligned with the division of tasks across partners.

The requested budget is appropriate to the size of the partnership and the geographical spread, but relatively high considering the limited impact and potential for systematic change.

Criterion 3 - Impact

Score: **15.00** (Threshold: 0 / 20.00 , Weight: -)

The following aspects have been taken into account:
- ambition and expected long-term impact of results on target groups/general public (0-5 points)
- appropriate dissemination strategy for ensuring sustainability and long-term impact (0-5 points)
- potential for a positive multiplier effect (0-5 points)
- sustainability of results after EU funding ends (0-5 points)

The project includes a promising system of expected results, which are concrete and likely to follow from the project implementation. Results are clearly defined in terms of short-term, medium-term, and long-term effects, and are measurable. The planned actions are likely to produce a tangible change primarily on the legislative level, and indirectly may have an impact on wider European society. Nevertheless, the project is unambitious in terms of scope, meaning there is a relatively small number of people who will directly benefit from it. This is particularly true for the users of the chatbox, where the expectation is that 150 people will use it within the project lifetime, which does not justify the investment in this project. The project is also unclear about the public use of the chatbot, as a subscription fee is mentioned. It remains unclear who will have access to use the chatbot at the end of the project. Thus, the proposal offers limited practical impact and systematic change compared to the expectations of the first priority of the call for proposals. The applicants neglect to explore gender-specific dimensions of the expected results.

The proposed communication and dissemination strategy offers a good mix of channels, including a detailed and promising reach in stakeholder engagement (regular forums) and academic outreach (peer-reviewed papers in relevant journals). It includes multiple channels that address all target groups, as well as the general public and policymakers, and articulates the need for gender-inclusive and non-stereotypical language. It is, however, not convincing in all of its decisions. Namely: the creation of the project website and project specific social media accounts is outdated and unsustainable (creating a YouTube account for this project is particularly redundant); the description of the final event in Brussels appears to be for a conference, and not a "festival". The strategy gives limited information if and how it will promote its resources, particularly the chatbot

The project is expected to produce knowledge and resources which are to be used in the field of legislation, research, awareness raising, educational activities among key stakeholders and victim support. While a sustained effect is not guaranteed within the project implementation, there is a potential for a multiplier effect.

The sustainability potential of the project is not convincing, as it provides little concrete commitments and potential for systematic change.
As part of their sustainability plans, the applicants will seek to facilitate integrating training resources in existing curricula of stakeholders, but do not commit to do so themselves – considering the majority of the partners are universities, this would considerably secure project sustainability. As a deliverable, both the beta and the final version of the chatbot are listed as "sensitive", while elsewhere a comment is made that it would be available against subscription fee. While this could be a good strategy for sustaining results beyond the project lifetime, this not sufficiently discussed and justified, considering the significant public investment in the development of this resource.

Scope of the proposal

<u>Status:</u> **Yes**

Comments (in case the proposal is out of scope)
Not provided

Project budget

General comments on the project budget:
Not provided

Overall comments

Not provided

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