



## VICTORIAN WOMEN'S TRUST

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Australia

Dear Mr Zorzi,

As the non-consensual sharing of intimate images becomes easier with the advent of new technologies, it represents a serious issue concerning the safety and wellbeing of women and girls as they increasingly navigate and live their lives through online spaces.

Since its inception in 1985, the Victorian Women's Trust has recognised the importance of health and wellbeing for women and girls in their ability to access life's opportunities and reach their full potential. In 2013, we launch our national initiative, The Dugdale Trust for Women & Girls (DTWG). Named after pioneering Australian feminist Henrietta Dugdale, DTWG focusses on the prevention and control of abusive behaviours experienced by women and girls, being any of emotional abuse, physical abuse, financial abuse, sexual abuse, suicide, self-harm, harmful gambling and substance abuse.

In 2014, we launched our flagship initiative of DTWG called *Rosie Respect*. It is geared to helping girls and young women to navigate the 'junk yard' of the internet and to find resources, information and materials that enable them to grow their resilience and make themselves less vulnerable to harm in their relationships and other interactions at school, in workplaces and life more generally. Now nearly 3 years old, Rosie has attracted over 2,300,000 web visitors. In 2015, Rosie launched a video called "The Art of Safe Sexting" which explored the legality, social context and importance of consent when sexting as well as a blog about the issue.

In 2017, we will launch a second major initiative of DTWG, *Club Respect*. This project will be hosted on an online platform by which Australians involved in any level of sport, across the country, can access the best possible supports in building and maintaining a culture of respect, non-violence and gender equality. By working closely with clubs, coaches, and players, we can tackle the root causes of violence, and change harmful, violent attitudes for the better. Given the problematic track record of sports players distributing non-consensual intimate images, this initiative is one which will be effective in primary prevention against the harms of non-consensual image sharing online.

Given our interest in the important issue of the safety of women and girls, the Trust welcomes the expanded mandate of the eSafety Commissioner to include online safety issues affecting adults and to address the issue of non-consensual sharing of intimate images.

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We also believe that the national online portal for reporting and support will be an effective way for those who have had intimate images of them shared online without their consent to access support and reduce stigma and shame around reporting, something which so often leads to under-reporting sexual assault, abuse and harassment.

In our submission we wish to highlight three things. Firstly, the importance of recognising that the harms caused in virtual spaces can be of equal if not exponentially greater than in physical spaces due to the anonymity and plasticity of online identities; global reach of the internet; and the ease of access for individuals.

Secondly, we wanted to stress that education around consent is vital for children, teenagers and adults who need support to make choices about their sexuality that is based on equality, dignity, and respect.

Lastly, the importance of a victim-led process is vital when considering this issue so that their wishes are respected at every stage of the identification, reporting and processes regarding sexual harassment and abuse online.

The Trust also believes that engagement with stakeholders on issues such as this is positive and crucial to minimise the harms associated with the practice, especially for women and girls, who should be able to feel safe and supported in all spaces, whether they be online or not.

We look forward to the outcomes of the consultation.

Regards,

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Maddy Crehan  
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## Introductory remarks

As the non-consensual sharing of intimate images becomes easier with the advent of new technologies, it represents a serious issue concerning the safety and wellbeing of women and girls as they increasingly use online space through which to navigate and live their lives.

Melbourne based academics Nicola Henry and Anastasia Powell have commented that, ‘research suggests that women are disproportionately the targets of harassment and hate speech in cyberspace’ compared to men.<sup>i</sup> Further, they comment that issues such as the non-consensual sharing of intimate images, ‘further highlight the problem created when legal, policy, and institutional responses have not kept pace with the development of new technologies, and where “old” responses to “new” behaviours may themselves result in further harm to the individuals involved.’<sup>ii</sup>

While legal responses to online child pornography have been relatively swift and punitive, responses of sexual abuse and harassment towards adult women, whether online or not, remain inadequate in addressing the harms caused by the perpetrator and achieving redress for the victim/survivor. The onus on the victim/survivor in reporting sexual crimes remains onerous and under-reporting of crimes continues due to the dominance of rape culture in our society which reinforces shame and stigma felt by victim/survivors.

The root causes of sexual abuse and harassment online are, as in physical spaces, a result of a desire by men to assert power over, objectify and assert ownership over women. Acceptance of violent and disrespectful attitudes are a key cause of issues like the non-consensual sharing of intimate images. In addition to establishing a civil penalties regime and an e-reporting tool in response to the non-consensual sharing of intimate images, education around respectful online behaviour, consent and the importance of bystander intervention are steps the Commissioner can take, either alone or in concert with other organisations, to ensure all individuals are able to engage online safely and respectfully.

## Issue for consideration

### ***A prohibition against sharing non-consensual images***

#### **1. Are there options for an alternative framing of the prohibition?**

We agree with the framing of the prohibition against sharing non-consensual intimate images.

We would like to point out that not all images that can cause harm and humiliation need to be inherently intimate. There are examples where graphic, fake advertisements of an individual advertising free sexual services accompanied by a non-intimate headshot are posted online by an individual’s stalker, ex-partner or current partner.

In 2013, a man from Maryland in the United States was found guilty of posting fake ads about his ex-wife, including one that said “Rape Me and My Children.” Fifty men showed up at the condominium where the woman lived with her children; some tried to break in.<sup>iii</sup> This fake ad using a stolen image was a serious threat to the woman even though it was not an intimate image of her.

Below are two recent Australian examples of sexualised abuse of individuals where a non-intimate image is shared online:

#### **Brighton Grammar Instagram account**

In July 2016 media reported on a case where Brighton Grammar students had created an Instagram account where students would post non-consensual photos of “sluts”. One picture was a girl in a bikini bottom and a white singlet accompanied by a caption describing sex acts she would perform on the boys. Her mother wrote that her daughter had been “sexualised” and “violated” even though the picture of her was not necessarily “sexual” or “intimate”.<sup>iv</sup>

#### **“Tinder girl” case study**

In 2016, Chris Hall shared a screenshot of Olivia Melville’s Tinder profile on Facebook where she quoted the lyrics of Canadian rapper Drake and it was shared thousands of times. Ms Melville then received a torrent of abuse including, ‘been called a slut, mocked about her weight, threatened with rape, and repeatedly told that she brought all the negative attention she has received on herself.’<sup>v</sup> One of Chris Hall’s friends Zane Alchin was arrested and charged with “using a carriage service to menace, harass or cause offence” as he sent repeated rape threats to Ms Melville and her friends.<sup>vi</sup> In this case, the selfie of Ms Melville on the profile shows a headshot of her smiling into the camera and by itself would not be considered intimate. However, the abuse towards her was sexually explicit in nature and was the cause of the humiliation and harm she experienced.

- 2. Should an Australian link be included in order for the prohibition to come into effect, e.g., should the person sharing the image, the subject of the image or the content host (or all) be Australian (or in the case of a content host, based in Australia or owned by an Australian company?)**

We think that if the subject of the image and/or the person who shared the image is an Australian resident or Australian-based (such as an international student) the prohibition should come into effect. The transnational nature of the internet, the ease of access and the plasticity of online identities means that if all three needed to be Australian, the effect of the prohibition would be raised, decreasing the timeliness and effectiveness of the prohibition.

#### ***Civil Penalty Regime***

- 3. What would be the best mix of enforcement tools to make available to the Commissioner?**

We believe the best mix of enforcement tools would combine civil and criminal penalties where initial steps such as end-user notices, injunctions and support with issuing of intervention orders on behalf of the victim need to be delivered as quickly as possible after the initial complaint to the Commissioner and/or police within a 24hr time frame. Images and posts are increasingly easy to share and as the Facebook algorithms prioritise imaged posts that have been commented on and shared, pushing them higher onto users feeds, time is of the essence to minimise harm to victims. Further enforcement tools such as criminal proceedings are not as time-sensitive but should be offered to the victim after the posts have been taken down if they wish.

**4. Should the Commissioner be able to share information with domestic and international law enforcement agencies?**

Yes, subject to appropriate protocols concerning the security and privacy of the victim are in place.

**5. What triaging processes should be implemented by the Commissioner for the handling of complaints? For example, if an intimate image is of a minor (a person under the age of 18), should the Commissioner be required to notify police and/or the parents/guardians of the minor? Should there be any circumstances in which the minor should have the option to request that police or family are not notified?**

We believe that minors or other victims of non-consensual sharing of intimate images should always have the option to request that police or family are not notified. This would have the effect of enabling the victim to take back control or consent of the situation where their trust and consent have not been respected by others. In a victim-led process, consultation with the victim should occur as often as possible in decisions taken by the eSafety Commissioner that concerns their complaint.

**6. In cases where an intimate image of a minor is shared without consent by another minor, should a different process be followed to cases where an image of an adult is shared by another adult?**

Often minors can be influenced more strongly by peer pressure, cultures of buy-in for certain social behaviours such as sharing intimate images where they may face social isolation and bullying by their peers if they do not engage in this normalised behaviour within a group no matter the legal and social implications of that behaviour.

According to Nicola Henry and Anastasia Powell, in online spaces 'group dynamics also work to diffuse moral or legal responsibility for group members, displace accountability, provide greater anonymity, and dehumanize and blame victims in ways never before imagined.'<sup>vii</sup>

Given these pressures that adults may not be as influenced by, a different process might be more appropriate for minors. For example, a formal warning system where individuals enter into behavioural change programs and education around consent, respectful relationships and violence against women. After 3 formal warnings have been issued by the Commissioner another process, equivalent to those undertaken with an adult perpetrator, might be triggered.

**7. In cases where the intimate image is of a minor and is shared by another minor, are civil penalties appropriate, or should existing criminal laws be used? Should this be dependent on the severity of the case (for example, how widely the image is shared or on what forums the images is shared)?**

As in our response to question 6, due to the social content of minors regarding peer-pressure and normalised non-consensual behaviour, civil penalties are appropriate. The severity of the case should always been taken into account as there will be exceptional cases that will need a different response. See our response to question 12 how widely the image is shared.

If the forum on which the image is shared is pornographic or sexually explicit in nature, we believe this is more severe than on a Facebook news feed. Forum choice can be indicative of the harm and humiliation the sender intended to cause the victim.

**8. Should a hierarchy of increasing severity of penalties be established? (This could reflect the severity of the incident and harm caused, with greater penalties for ‘repeat’ offenders, or for offenders which have sought to impose additional harm by intentionally seeking to maximise the exposure of the images through various forums.)**

There should be a hierarchy of penalties based on the severity of the crime based on harm or likely degree of harm caused to the victim and the intent to cause harm by the offender.

**9. Would a hierarchy of penalties lengthen the complaint process, and what effect might that delay have on a victim?**

As in our answer to question 3, consideration must be given to the most expeditious way of removing the images from the internet to limit the quick transmission of the image through technological or analogous means (eg. printing out the picture).

It is assumed that the hierarchy of penalties would lengthen the complaint process which has the effect, as in other sexual abuse cases of exacerbating the trauma experienced by the victim. This is often a factor in discouraging victims from reporting or disclosing the abuse or harm they experience which is something which should be considered by the Commissioner in designing the complaints process.

**10. What technological tools could the Commissioner use in order to combat the sharing of intimate images without consent?**

We don't have the expertise to comment but the ability to upload multiple screenshots would be an important function of the eSafety Commissioner portal as is used in the current cyberbullying report form.<sup>viii</sup>

**11. Should a cooperative arrangement with social media services be established, in a similar manner to the existing cyberbullying complaints scheme?**

Yes, social media services have an important role to play in disrupting the transmission of non-consensual intimate images which cause harm to the those who use their services. We welcome the steps taken so far by social media services such as Facebook, Reddit, Twitter, Instagram, Yahoo, Google and Bing to incorporate reporting, photo-matching technology and taking down of non-consensual intimate images which have been shared on their service.<sup>ix</sup> However, as many of these steps taken so far have not eliminated these problems, and have allowed and exacerbated them (as exemplified below), the Commissioner should consider whether regulatory reprimands for social media services could be pursued.

As exemplified by prominent feminist activists such as Clementine Ford, mechanisms like Facebook's community standards can render victim's voices invisible and exacerbate the harm to the victim by not acknowledging that harm was caused or by refusing to acknowledge that harm has been caused, triggering the take down of the post in question.<sup>x</sup>

The omission of 'secret groups' from Facebook's "revenge porn" definition is something that signifies the complexities of the issue of the non-consensual sharing of intimate images. Facebook's definition of "revenge porn" as "attempts to use intimate imagery to shame, humiliate or gain revenge against an individual" have been described by Dr. Mary Anne Franks, Cyber Civil Rights Initiative's legislative and tech policy director, as 'illuminating and disappointing.'<sup>xi</sup> Dr. Franks points out that this definition 'essentially defines the abuse in such a way that 'secret' groups can never be guilty of it. By hiding their activities from their victims, these groups demonstrate that their intent is not to 'shame or embarrass' their victims.'<sup>xii</sup> By not including the need for consent for the image to be shared, Facebook's definition effectively creates a loophole for victim redress if they do not know that their image has been shared even though their image has been shared without their consent.

We believe further work needs to be done by the Commissioner in concert with social media and image sharing sites within a cooperative arrangement. Conditions users agree to when they initially sign up to the site need to be more explicit so that the social media service can automatically delete their account and pictures made by their account if they violate those terms and conditions. Other future technologies such as programs which are able to scan photographs before they are shared would be a significant jump in disrupting the non-consensual sharing of intimate images and might be pursued by the Commission with similar departments in other countries and with social media services.

## **12. Should penalties differ depending on the intent of the image sharer, or on how widely the image is shared?**

Yes, the intent of the image sharer is vital when considering the harm done to the victim which might not necessarily correlate to the number of people the image is shared with or how widely the image has been shared. For example, if the image sharer sent the image or threatened to send the image to the subject's immediate family the harm could potentially be greater to the subject due to a range of social and cultural reasons pertaining to the individual. Other examples where the number of people the image is shared with may be small but where the harm to the victim is great might be with more distant family members like grandparents, school friends, work colleagues, or

members of a religious community.

In other cases it may be the sheer number of strangers the image is shared with, exemplified by Olivia Melville's "Tinder girl" case, that is the cause of the harm, humiliation and trauma she experienced. Wider sharing of the image may increase the likelihood of escalating harm to a victim because of the perceived acceptance or normalisation of abuse towards that individual by the group with who the image is shared. This is present in the Tinder Girl case where Olivia and her friends received rape threats from Zane Alvin after Chris Hall shared her image on Facebook.

**13. Should the range of enforcement actions be applicable to parties other than the person sharing the image or the content host?**

Olivia Melville's "Tinder girl" example provides a case that any person who contribute to further distribution of a non-consensual image can be considered in a complaint to the Commissioner.

**14. Should the Commissioner be able to seek a court order to require Internet Service Providers (ISPs) to block individual website(s) in extreme cases where all other avenues have been exhausted?**

Yes, we think that is an appropriate last resort action.

***Information gathering powers***

**15. Should these information gathering powers be made available to the Commissioner in order to administer the proposed civil penalty regime?**

Yes. Both the proposed civil penalty and possible further criminal proceedings would be aided by the information gathering powers outlined under the *Telecommunications Act 1997 (Cth)*.

**16. Should the Commissioner be granted search warrant powers?**

Yes. Could be vital in collecting evidence for the victim.

***Complaints process***

**17. Should victims be compelled to use established complaints processes (where available) prior to lodging a complaint with the Commissioner?**

No. Ease of access and privacy to encourage victims to report are supported by the Commission's e-reporting process and addresses accessibility issues like living in a remote area or not being able to physically access a police station due to age or disability. Issues like inability to use speech to report are also supported by the Commission's e-reporting process.

This inquiry should consider whether using established complaints processes on behalf of the victim/reporter would minimise further harm to the individual and could be undertaken by the Commission.



**18. What is an appropriate length of time for a victim to wait to hear the result of a complaint prior to contacting the Commissioner?**

24 hours.

**19. Should there be a legal obligation on content hosts (e.g. websites, online forums, message boards, social media services) to remove the images identified by the Commissioner as requiring removal?**

Yes.

**20. What penalties should apply to content hosts which refuse to comply with a directive from the Commissioner to remove images which have been the subject of a complaint?**

We believe that a monetary penalty of a financially detrimental scale to the content host would be the most effective way to discourage non-compliance with directives from the Commissioner to remove images.

### ***Definitions of terms***

#### ***Consent***

**21. What should constitute ‘consent to share’? Can consent be implied, or should explicit verbal or written permission be required?**

Explicit verbal or written permission would be required and sought by the image sharer. The assumption should be that the image doesn’t come with consent to share and that consent must be sought. It is very unlikely that the person who took the intimate image would consent to further sharing and that should be the assumed status of the image. Sexually explicit captions that accompany non-intimate images should also be assumed to be non-consensual unless explicit verbal or written permission is given by the subject of the image.

**22. Should cases be treated differently where the victim has given consent for an image to be shared in one context, but the image is then shared in a different context to that for which consent had been given? (For example, if consent is initially given for an image to be shared via one-to-one message, but the image is later shared by posting online?)**

No, consent in the context it was given only stands. Consent is non-permanent and non-negotiable and needs to be re-negotiated. If we use an example of consent in the physical world, consent to sex one minute between two (or more) individuals does not equate to sex the next minute or even hours, day, weeks or months later. The issue of consent goes to the centre of the issue of non-consensual sharing of intimate images, where the sharer intends to exert power and ownership over the victim by sharing their image.

**23. Should special consideration be given regarding consent from vulnerable people? If so, how can ‘vulnerable people’ be defined?**

Vulnerable people: intoxicated, on drugs, asleep, underage, disability (physically or cognitive), someone in a current abusive relationship or has a history of abuse, someone who is financially indebted to the image sharer.

The image sharer still needs to ensure consent is given and if the person is vulnerable, non-consent to share should be assumed.

**24. Should the person sharing the image be required to prove consent?**

Yes, explicit consent needs to be proven in all cases.

**25. How should cases be treated where consent is given, but is later withdrawn? Should such cases be treated differently to cases where consent has never been given?**

Yes, if consent is given but later withdrawn these cases should be treated exactly the same to cases where consent was never given. Consent is not permanent and flexible and needs to be non-negotiable and needs to be re-negotiated.

***Intimate Image***

**26. What should the definition of 'intimate images' be for the purpose of the prohibition?**

The range of behaviours identified in the Constitutional Affairs References Committee inquiry into revenge porn is appropriate in this context.

It is important to consider the social, cultural or religious background of the victim be included when deciding whether the Commissioner should pursue the case. This may be covered by the Canadian definition involving 'a reasonable expectation of privacy' when the image is taken.

**27. Should the prohibition cover 'digitally manipulated or created' images where, for instance, the victim is not readily identifiable or, conversely, added to a sexually explicit photo?**

Yes.

**28. How might community standards be applied in the consideration of whether an image is intimate?**

The cultural, social, religious, ethnic context of the victim is most important when considering whether the image is intimate. That the victim feels that the image is 'intimate' should be sufficient for the Commissioner to proceed with their case.

***Sharing***

**29. What should the definition of 'sharing' be for the purpose of the prohibition?**

Showing the image to anyone that the victim hasn't given consent to see via physical or technological means is an important inclusion in the definition. For example, showing someone else the image on your phone without sending it to them or printing out the image and distributing it.

**30. To the extent the Commonwealth is able to legislate, should the definition of sharing be confined to the digital space, or should the definition should consider sharing beyond this? (For example, a still digital image that is printed and then shared in physical form.)**

Yes. See point above.

**31. Should an intimate image which is shared with only one person be considered less harmful than an image publicly shared with a wider audience or with unknown parties?**

The degree of harm entirely depends on the victim and the proportionate harm done to them by their relationship with those with whom the image has been shared or the humiliation caused. See our response to number 12.

**32. How might the prohibition apply to a person sharing intimate images who claims to be, or is found to be, unable to fully understand 'consent' (e.g. the sharer was intoxicated at time of sharing the image, the sharer is mentally disabled, the person is under the age of 18, etc.)?**

It is really hard to see an example of where a person can be excused for sharing beyond the intended audience. Consent importance for behavioural programs, sex offender rehabilitation, autism socialisation programs and sex education for all children, among others.

Lack of education around consent is a clear issue in Australia, especially amongst young people. In 2015, the Young Women's Advisory Group (YWAG) conducted a national survey of women aged 16-21 who had attended school in Australia asking about their sexuality and respectful relationships education. This survey was one of the first in Australia to ask young women what their experiences of sexuality education were like, and to find out whether it met their needs to develop healthy and respectful relationships. With less than 2% of respondents rating their experience of sex education in school as excellent and nearly 50% rating their experience as poor, sex education in Australia is in dire need of reform. Significantly, the survey found that 63% of young women and girls were not taught about consent.<sup>xiii</sup> This is in the context of a 2015 VicHealth survey which found that 22% of male respondents aged 16-24 believe that women often say 'no' when they mean 'yes' and 60 per cent of respondents put the responsibility for consent on the girl.<sup>xiv</sup> These attitudes are reflected in young people's actions and decisions made in the online space.

***Intent to cause harm***

**33. Should 'intent to cause harm' or 'seriousness' be included as elements of the prohibition?**

Yes.

**34. Should 'intent to cause harm' or 'seriousness' be factors to be considered by the Commissioner in determining the action to be taken against a perpetrator?**

Yes.

**35. Should actual harm (emotional or otherwise) have to be caused to the victim for the purposes of the Commissioner determining what action to take against a perpetrator, or should it be sufficient that there was a likelihood of harm occurring?**

It should be sufficient that there was a likelihood of harm occurring. Trauma and PTSD from having intimate images of you shared online may not manifest immediately or be resolved quickly. Also, any future manifestations of trauma cannot be determined and may take years to manifest in the victim's behaviour or experience.

**36. Should the Commissioner give consideration to the ‘likely’ degree of harm to the victim in determining the action to take, or to the actual degree of harm that has arisen?**

Both the ‘likely’ and ‘actual’ degree of harm can be incredibly subjective and both need to be taken into account by the Commissioner.

**Electronic service, social media service and relevant electronic service**

**37. Are the definitions in the *EOSC Act* suitable for cases involving non-consensual sharing of intimate images?**

Yes.

**38. Should any other technologies or distribution methods not covered by these definitions be included?**

It is unclear whether automatic syncing to cloud storage from mobile devices would be included in this definition. In 2014, Jennifer Lawrence and other celebrities images were stolen from their Gmail and Apple iCloud accounts.<sup>xv</sup>

***Other comments***

Another form of online harassment and abuse which could also be termed ‘non-consensual sharing of intimate images’ is the phenomenon colloquially known as “sending unsolicited dick pics”. This involves one or more individuals sending pictures of their genitalia without consent being given by the receiver.

Hailey Gleeson, writing for the *ABC* describes the phenomenon as ‘One of the most under-reported parts of the experience of women online’ and ‘almost so common that it merits little discussion’.<sup>xvi</sup> Dr Nicola Henry, a senior lecturer in crime, justice and legal studies at La Trobe University commented on the phenomenon, "In some cases, people are doing it as a form of sexual harassment; they are deliberately trying to harass and intimidate another person."<sup>xvii</sup>

Common responses to unsolicited dick pics are retaliation by sharing the pictures with the senders family or friends or by sending unsolicited dick pics found on the internet back to the sender, as exemplified by Rebecca McGregor, who forwarded an unsolicited dick pic to the sender’s mother.<sup>xviii</sup>

The Commissioner should also consider whether this phenomenon is something which could come under the Commissioner’s mandate.

## Conclusion

An efficient civil penalties regime for non-consensual sharing of intimate images cannot be effective unless it is combined with education around respectful relationships between individuals, consent and the importance of bystander intervention. The Trust recommends that the Commissioner consider the merit of an extensive education campaign in schools, sports clubs, community centres and on social media sites of the Commissioner's e-reporting tool and the penalties for the non-consensual sharing of intimate images to prevent and deter this harmful behaviour.

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<sup>i</sup> Henry N & Powell A 2015, 'Embodied Harms: Gender, Shame, and Technology-Facilitated Sexual Violence', *Violence Against Women*, vol. 21 no. 6, 759.

<sup>ii</sup> Henry N & Powell A 2015, 'Embodied Harms: Gender, Shame, and Technology-Facilitated Sexual Violence', *Violence Against Women*, vol. 21 no. 6, 766.

<sup>iii</sup> Margaret Talbot 2016, 'The Attorney Fighting Revenge Porn', *The New Yorker*, 5 December, viewed online 27 June 2017, <http://www.newyorker.com/magazine/2016/12/05/the-attorney-fighting-revenge-porn>

<sup>iv</sup> Lillebuen S & Cook, H 2016, Brighton Grammar boys rate schoolgirl 'sluts' on vile Instagram account', *The Border Mail*, 18 July, viewed online 27 June 2017, <http://www.bordermail.com.au/story/4035876/brighton-grammar-boys-rate-schoolgirl-sluts-on-vile-instagram-account/?cs=12>

<sup>v</sup> Lattouf, A 2016, 'That Tinder girl': Olivia Melville speaks out about online harassment', *ABC News*, 20 June, viewed online 27 June 2017, <http://www.abc.net.au/news/2016-06-19/that-tinder-girl-olivia-melville-speaks-out/7519724>

<sup>vi</sup> Lattouf, A 2016, 'That Tinder girl': Olivia Melville speaks out about online harassment', *ABC News*, 20 June, viewed online 27 June 2017, <http://www.abc.net.au/news/2016-06-19/that-tinder-girl-olivia-melville-speaks-out/7519724>

<sup>vii</sup> Henry N & Powell A 2015, 'Embodied Harms: Gender, Shame, and Technology-Facilitated Sexual Violence', *Violence Against Women*, vol. 21 no. 6, 769.

<sup>viii</sup> <https://submit.esafety.gov.au/Produce/wizard/ca3acccd-07bf-4a12-9c0e-f93e50a46ab6?portal=1>

<sup>ix</sup> One example is Facebook's latest community standards. See Davis, A 2017, 'Using Technology to Protect Intimate Images and Help Build a Safe Community', *Facebook newsroom*, April, viewed online 27 June 2017, <https://newsroom.fb.com/news/2017/04/using-technology-to-protect-intimate-images-and-help-build-a-safe-community/>

<sup>x</sup> See Moran R 2016, 'Clem Ford slams Facebook over shameful 'community guidelines' double standard', *Sydney Morning Herald*, 29 March, viewed online 28 June 2017, <http://www.smh.com.au/lifestyle/news-and-views/social/clem-ford-slams-facebook-over-shameful-community-guidelines-double-standard-20160328-gnspr7.html>

<sup>xi</sup> O'Brien S 2017, 'Facebook's imperfect fight against revenge porn', *CNNtech*, 1 June, viewed online 28 June 2017, <http://money.cnn.com/2017/06/01/technology/business/facebook-content-moderation/index.html>

<sup>xii</sup> O'Brien, S 2017, 'Facebook's imperfect fight against revenge porn', *CNNtech*, 1 June, viewed online 28 June 2017, <http://money.cnn.com/2017/06/01/technology/business/facebook-content-moderation/index.html>

<sup>xiii</sup> YWAG 2015, 'Let's talk: young women's view on sex education', *Equality Rights Alliance*, viewed online 29 June 2017, <http://www.equalityrightsalliance.org.au/wp-content/uploads/2016/10/Lets-Talk-Final-Report.pdf>

<sup>xiv</sup> Harris, A, Honey, N, Wevster, K, Diemer K & Politoff, V 2015, 'Young Australians' attitudes to violence against women: Findings from the 2013 National Community Attitude towards Violence Against Women Survey for respondents 16-24 years', *Victorian Health Promotion Foundation: Melbourne*, p. 57.

<sup>xv</sup> See: Worland J 2014, 'How That Massive Celebrity Hack Might Have Happened', *TIME Magazine*, September 2, viewed online <http://time.com/3247717/jennifer-lawrence-hacked-icloud-leaked/>

<sup>xvi</sup> Gleeson, H 2016, 'Why do men send unsolicited dick pics?', *ABC online*, 9 July, viewed online 29 June 2017, <http://www.abc.net.au/news/2016-07-09/why-men-send-unsolicited-dick-pics/7540904>

<sup>xvii</sup> Gleeson, H 2016, 'Why do men send unsolicited dick pics?', *ABC online*, 9 July, viewed online 29 June 2017, <http://www.abc.net.au/news/2016-07-09/why-men-send-unsolicited-dick-pics/7540904>

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<sup>xviii</sup> See: Pygas M 2017, 'Woman Responds To Unsolicited Dick Pic By Sending It To His Mom', 27 June, *Distractify*, viewed online 29 June 2017, <http://www.distractify.com/trending/2017/06/27/2ogJQd/unsolicited-pic-send-to-his-mom>