

Image-Based Sexual Offences and Irish Law: Does the Harassment, Harmful Communications and Related Offences Bill 2017 Provide Adequate Legal Protection for Victims?

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Abstract

The non-consensual creation and distribution of private sexual images online is currently not characterised as a criminal offence under Irish law. The Harassment, Harmful Communications and Related Offences Bill 2017 aims to rectify this *lacuna* by creating new image-based sexual offences such as revenge pornography and upskirting. However, I would submit that the Bill, as initiated, requires further amendment relating to both substantive and procedural provisions if it is to offer victim-survivors adequate legal protection. Just prosecutorial thresholds, accessible procedures, and comprehensive legislative definitions must be ensured in order to enact a modern, coherent statute which addresses the malicious and gendered practice of the non-consensual generation and distribution of images of a sexual nature.

While sexual violence, harassment and the non-consensual distribution of private sexual images are not new phenomena, technological advancements coupled with the ubiquity of the smartphone have facilitated the emergence of ‘image-based sexual offences,’ a term which encompasses the ‘non-consensual creation and/or distribution of private sexual images.’²⁵⁵ Section 4 of Labour’s Harassment, Harmful Communications and Related Offences Bill (hereafter referred to as ‘the Bill’) proposes new offences relating to the non-consensual creation and distribution of private sexual images, including ‘upskirting’ and ‘revenge pornography.’²⁵⁶ Unlike most British, American and Australian jurisdictions, Irish law at present offers inadequate protection for victims of sexual cyber-harassment.²⁵⁷ The offence of harassment,²⁵⁸ for example, requires the accused to directly and “persistently” interfere with the peace and privacy of another, and

²⁵⁵ Clare McGlynn and Erica Rackley, ‘Image-Based Sexual Abuse,’ (2017) 37 OJLS 534.

²⁵⁶ Sponsored by then-Labour party leader Brendan Howlin, the Bill passed the Second Stage of the legislative process in the Dáil, and secured government approval to draft amendments on a priority basis in May 2019. Since the time of writing, the Bill has lapsed with the dissolution of the Dáil.

²⁵⁷ Rape Crisis Network Ireland, ‘Submission on the Online Harassment, Harmful Communications and Related Offences to the Joint Oireachtas Committee on Justice and Equality’ (September 2019) 2 <<https://www.rcni.ie/wp-content/uploads/RCNI-Online-Harassment-Harmful-Communications-and-Related-Offences-Bill-2017-JOCJE-Submission-September-2019-LPD-Final-2.pdf>> accessed 8 October 2019.

²⁵⁸ Non-Fatal Offences Against the Person Act 1997, s 10.

thus precludes one-off image-based sexual offences, as well as the non-consensual distribution of images to third parties. Contrary to the views of the Law Reform Commission,²⁵⁹ Rape Crisis Network Ireland (RCNI) identifies image-based sexual offences as “a form of sexual violence against its victims”²⁶⁰ as opposed to “harmful communications crimes.”²⁶¹ Indeed, the UN Committee on the Elimination of Discrimination Against Women has expressed its concern at the lack of legal protection in Ireland for victims of this form of gender-based violence,²⁶² and with 10% of Irish women experiencing sexual cyber-harassment since the age of fifteen,²⁶³ the Bill intends to correct the obvious *lacuna*, or gap, in Irish law.²⁶⁴ However, I would criticize the Bill as initiated, and submit that it requires further amendment relating to both substantive and procedural provisions if it is to offer victims adequate legal protection.

²⁵⁹ The Law Reform Commission is an independent body established under the Law Reform Commission Act 1975. The Commission conducts research, formulates proposals, and makes recommendations to the Oireachtas with a view to reforming the law.

²⁶⁰ Rape Crisis Network Ireland (n 3) 2.

²⁶¹ Law Reform Commission, *Report on Harmful Communications and Digital Safety* (LRC 116 – 2016) 106.

²⁶² UN Committee on the Elimination of Discrimination Against Women, ‘Concluding Observations on the Sixth and Seventh Periodic Reports of Ireland’ (9 March 2017) UN Doc CEDAW/C/IRL/6-7.

²⁶³ European Agency for Fundamental Rights, *Violence Against Women: An EU-wide survey* (Luxembourg, Publications Office of the European Union, 2015) 105.

²⁶⁴ Dáil Deb 16 May 2017, vol 950.

By recognising image-based sexual abuse as a form of sexual violence, Irish legislators can effectuate a broader legal and policy response to violence against women and gendered societal practices in general, such as victim-blaming. Professors McGlynn and Rackley maintain that image-based sexual abuse is situated “on the continuum of sexual violence.”²⁶⁵ The harms suffered by victim-survivors are deeply gendered as well as far-reaching, ranging from the violation of personal and bodily integrity, to the infringement of one’s dignity and privacy and the inhibition of sexual autonomy.²⁶⁶ Indeed, recent research reveals that while most victims of image-based sexual abuse are women, men constitute the vast majority of perpetrators.²⁶⁷ The term ‘cybermisogyny’ encapsulates this diverse form of “gendered hatred, harassment, and abusive behaviour directed towards women and girls online.”²⁶⁸ In the absence of legal protection for victim-survivors of image-based sexual abuse in Ireland, the prevalence of such offences may continue to rise, as evidenced by the increase in the

²⁶⁵ McGlynn and Rackley (n 1) 537.

²⁶⁶ Ibid 544 – 49.

²⁶⁷ Elizabeth Farries and Tristan Sturm, ‘Feminist legal geographies of intimate-image sexual abuse: Using copyright logic to combat the unauthorized distribution of celebrity intimate images in cyberspaces,’ (2018) 51(5) *EPA: Economy and Space* 1145, 1148.

²⁶⁸ West Coast LEAF, ‘Using and Strengthening Canadian Legal Responses to Gendered Hate and Harassment Online’ (June 2014) <www.clicklaw.bc.ca/resource/2867> accessed 30 January 2020.

number of women reporting sexual cyber-harrassment every year.²⁶⁹

The tragic case of Dara Quigley exemplifies the necessity for legislation of this kind. The young journalist and activist was detained under the Mental Health Act²⁷⁰ by members of An Garda Síochána in April 2017 after walking naked in a Dublin street. CCTV cameras installed at the location captured footage of her arrest. This recording, which was held by An Garda Síochána, was shared to a WhatsApp group and subsequently to Facebook²⁷¹ where it was viewed 125,000 times before its request for removal.²⁷² Several days after this footage was circulated online, Ms Quigley took her own life. Two and a half years later, no individual or organisation has been held accountable for the release of the footage.²⁷³ According to the Irish Council of Civil Liberties

²⁶⁹ Joint Committee on Justice and Equality Deb 23 October 2019 <<https://debatesarchive.oireachtas.ie/Debates%20Authoring/DebatesWebPack.nsf/committeetakes/JUJ2019102300002?opendocument#F00100>> accessed 4 January 2020.

²⁷⁰ Mental Health Act 2001, s 12.

²⁷¹ Rónán Duffy, 'Deplorable and revolting' treatment of deceased activist Dara Quigley is raised in the Dáil,' *TheJournal.ie* (May 2017) <<http://www.thejournal.ie/dara-quigley-dail-3384651-May2017/>> accessed 30 January 2020.

²⁷² Conor Feehan, 'Garda who filmed tragic journalist Dara Quigley to avoid prosecution,' *Independent.ie* (August 2018) <<https://www.independent.ie/irish-news/garda-who-filmed-tragic-journalist-dara-quigley-to-avoid-prosecution-37184945.html>> accessed 30 January 2020.

²⁷³ Irish Council for Civil Liberties, 'ICCL Online Harassment Submission,' (October 2019) 3 <<https://www.iccl.ie/wp-content/uploads/2019/10/ICCL-Online-Harassment-Submission.pdf>> accessed 30 January 2020.

(ICCL), Ms Quigley's case illustrates the "inadequate legal framework around the use and abuse of sexualised imagery without consent, a lack of transparency around individual company standards on moderation content and removal, and a culture of online harassment that mirrors real world ills."²⁷⁴

It is crucial that we look to the legislation of our common law neighbours in order to enact a modern, comprehensive statute which addresses the malicious practice of the non-consensual generation and distribution of images of a sexual nature. Several substantive and procedural shortcomings of the Bill, however, must be addressed. Firstly, the terminology and thresholds of Section 4 of the Bill could potentially limit prosecutorial possibilities, especially in relation to the intent of the perpetrator. Section 4(1) of the Bill states that a person is guilty of an offence if they 'record, distribute or publish ... an intimate image of another person without the other person's consent' and in doing so intend to 'seriously interfere with the other person's *peace and privacy*' or 'cause *alarm, distress or harm* to the other person.'²⁷⁵ While incidences of 'revenge porn' are typically associated with a malicious intent to humiliate the victim, motivations to commit one-off image-based sexual offences such as upskirting are not as straightforward. Indeed, organisations such as RCNI and ICCL object to the use of the term "revenge porn,"²⁷⁶ as it focuses exclusively on the motives of perpetrators, rather than the harms suffered by victim-survivors, while also instilling a sense of choice and legitimacy which is inappropriate when debating the non-

²⁷⁴ *ibid.*

²⁷⁵ Harassment, Harmful Communications and Related Offences Dáil Bill (2017) 63, s 4(1)(b) (emphasis added).

²⁷⁶ Joint Committee on Justice and Equality, (n 15).

consensual creation and/or distribution of sexual images.²⁷⁷ RCNI submits that there is a risk that perpetrators may not qualify the *mens rea* element of the offence if motivations are too specific,²⁷⁸ particularly if an image was distributed for financial gain, sexual gratification, amusement, notoriety, or something else unanticipated.²⁷⁹ The fact that the recording and distribution of the image was non-consensual should suffice.

The “intention to cause distress” requirement of Section 33 of the Criminal Justice and Courts Act 2015 of England and Wales, for example, has been criticised as too restrictive²⁸⁰ and accounts for a low prosecution rate in this jurisdiction, with 61% of reported ‘revenge pornography’ offences between April and December 2015 resulting in no action being brought against the perpetrator.²⁸¹ A similarly restrictive provision in Irish law would preclude incidences where “secondary distributors” of intimate images are not aware of the identity of the victim.²⁸² Moreover, this provision requires the prosecution to prove beyond a reasonable doubt that the actions of the accused caused alarm, distress, or harm - a requirement which ‘reifies an ‘ideal victim’ by predetermining what is seen to be the ‘appropriate response’ of victim

²⁷⁷ McGlynn and Rackley, (n 1) 536.

²⁷⁸ Rape Crisis Network Ireland (n 3) 4.

²⁷⁹ McGlynn and Rackley (n 1) 556.

²⁸⁰ *ibid.*

²⁸¹ Peter Sherlock, ‘Revenge Pornography Victims as Young as 11, investigation finds’ *BBC News* (27 April 2016) <<https://www.bbc.com/news/uk-england-36054273>> accessed 12 October 2019.

²⁸² McGlynn and Rackley (n 1) 556.

survivors.²⁸³ Prosecutions could also be rendered infeasible in cases where multiple victims are targeted and their images shared unknowingly, thereby precluding the evidence of “distress,” while also requiring these victims to be informed of the perpetrator’s actions.²⁸⁴ McGlynn and Rackley favour the comparable Scottish offence,²⁸⁵ as the *mens rea* element is satisfied when it has been proven that the accused “caused fear, alarm, or distress” and was “reckless” as to this,²⁸⁶ thus encompassing a wider spectrum of intentions. The Law Reform Commission identifies the importance of legal specificity in this context, and the danger of drafting broad offences which may prove vulnerable to unconstitutionality,²⁸⁷ and so in order to limit the wide scope of this provision, a suitable defence could be the reasonable belief that the images were publicly distributed with consent, or that they previously existed in the public domain for gain.²⁸⁸ On this basis, the Oireachtas should adopt the Scottish rather than the English interpretation of intent and revise its original narrow definition.

In addition, the Bill should ensure that victims of image-based sexual offences are afforded the same procedural and substantive protection as victims of sexual offences currently recognised under Irish law. It is essential that the definition of ‘consent’ as contained

²⁸³ McGlynn and Rackley, ‘More than ‘Revenge Pornography’: Image-based Sexual Abuse and the Reform of Irish Law’ (2017) 14 IPJ 38, 45.

²⁸⁴ McGlynn and Rackley, ‘More than ‘Revenge Pornography’ (n 29) 46.

²⁸⁵ McGlynn and Rackley, ‘Image-Based Sexual Abuse’ (n 1) 557.

²⁸⁶ Abusive Behaviour and Sexual Harm (Scotland) Act 2016, s 2(1)(b).

²⁸⁷ Law Reform Commission (n 6) 90.

²⁸⁸ McGlynn and Rackley, ‘Image-based Sexual Abuse’ (n 1) 557.

in Section 9 of the Criminal Law (Rape) Amendment Act 1990 is identical to that which is found in Section 4(2) of the Bill, in order to eliminate any risk of ambiguity and ensure consistency across all sexual offences. As it stands, Section 4(2) of the Bill defines consent as ‘the agreement by choice of a person who has the freedom and capacity to make that choice,’ but fails to explicitly mention the circumstances in which consent is *not granted* as featured in the 1990 Act. The meaning of consent in specific relation to intimate image offences is clearly outlined in the Crimes Amendment (Intimate Images) Act 2017 of New South Wales. Crucially, this act recognises that ‘a person who consents to the distribution of an image to a particular person’ is not to be regarded as having consented to the distribution of that same image to another person.²⁸⁹ A clear distinction between consent to *create* an intimate image and consent to *distribute* such an image would be essential. In addition, a procedural protection which is lacking in the current Bill is the entitlement to civil legal aid and advice, as is granted to victims of sexual assault under the Civil Legal Aid Act 1995.²⁹⁰ McGlynn and Rackley submit that civil rather than criminal law may be a preferable form of redress in these cases as it puts “the victim-survivor back in control,” ensures anonymity, and offers remedies such as substantial damages and/or injunctive relief²⁹¹ (see the UK case *ABK v KDT & FGH*²⁹² in which the claimant was granted an interim non-disclosure order to protect her

²⁸⁹ Crimes Amendment (Intimate Images) Act (No 29) 2017 (NSW) div 15 s 91O(5).

²⁹⁰ Civil Legal Aid Act 1995, s 26(3)(b).

²⁹¹ McGlynn and Rackley, ‘Image-Based Sexual Abuse’ (n 1) 559.

²⁹² [2013] EWHC 1192.

right to privacy following the non-consensual disclosure of private sexual images). That is not to say that a content removal order should be the sole legal remedy available for victims of image-based sexual abuse. The proposed Online Safety Media Regulation Bill 2019 provides for the appointment of an Online Safety Commissioner as part of a wider media commission to regulate social media platforms, issuing compliance and warning notices, and impose sanctions for non-compliance (failing to take down ‘harmful content’).²⁹³ However, victim-survivors will continue to lack legal recourse, and without an explicit statutory provision criminalising such image-based sexual offences, perpetrators may continue to escape prosecution.

Finally, the Irish legislature should address the latest nefarious forms of sexual cyber-harassment in the Bill by firstly, criminalising the creation of audio records of sexual assaults, and secondly, the impersonation of others through the superimposition of a victim’s face onto the body of another person using artificial-intelligence software (a phenomenon commonly known as ‘deepfaking’²⁹⁴). The former offence is recognised as an “indecent sexual verbal communication” in Scotland,²⁹⁵ and RCNI note that

²⁹³ Department of Communications, Climate Action and Environment, ‘General Scheme Online Regulation Bill 2019,’ (January 2020) <<https://www.dccae.gov.ie/en-ie/communications/legislation/Pages/General-Scheme-Online-Safety-Media-Regulation.aspx>> accessed 30 January 2020.

²⁹⁴ Drew Harwell, ‘Fake-porn videos are being weaponized to harass and humiliate women: Everybody is a potential target,’ *The Washington Post* (30 December 2018) <<https://www.washingtonpost.com/technology/2018/12/30/fake-porn-videos-are-being-weaponized-harass-humiliate-women-everybody-is-potential-target/>> accessed 14th October 2019.

²⁹⁵ Sexual Offences (Scotland) Act 2009, s 7(4).

an increased number of their clients are reporting the distribution of these recordings on the internet.²⁹⁶ Similarly, ‘deepfaking’ has become “a new and degrading means of humiliation, harassment and abuse.”²⁹⁷ A vast majority of these videos are pornographic in nature, and as a result have devastating consequences on a victims’ professional lives, interpersonal relationships, reputations and mental health.²⁹⁸ While some lawyers argue that available legal remedies relating to defamation and harassment eliminate the necessity for an explicit legal provision criminalising the creation and distribution of deepfakes,²⁹⁹ the case of journalist Rana Ayyub undoubtedly exposes this gap in the law.³⁰⁰ The definition of ‘intimate image’ under section 4(2) of the Irish Bill currently only recognises the visual recording of images/videos of a private and sexual nature and fails to explicitly cover the creation and modification of such videos or images. Our legislature could, for example, adopt the provisions of the law recently enacted in Virginia which recognises that a person’s image can be used in the ‘creation, adaptation, or modification of a videographic or still image’ which was composed ‘with the intent to depict an actual

²⁹⁶ Rape Crisis Network Ireland (n 2) 8.

²⁹⁷ Drew Harwell (n 31).

²⁹⁸ *ibid.*

²⁹⁹ David Greene, ‘We Don’t Need New Laws for Faked Videos, We Already Have Them.’ (Electronic Frontier Foundation, 13 February 2018) <<https://www.eff.org/deeplinks/2018/02/we-dont-need-new-laws-faked-videos-we-already-have-them>> accessed 15 October 2019.

³⁰⁰ Rana Ayyub, ‘I Was the Victim of a Deep Fake Porn Plot Intended to Silence Me,’ (The Huffington Post, 21 November 2018) <https://www.huffingtonpost.co.uk/entry/deepfake-porn_uk_5bf2c126e4b0f32bd58ba316> accessed 15 October 2019.

person and who is recognizable as an actual person by the person's face, likeness, or other distinguishing characteristic.’³⁰¹ It would also be expedient to recognise the offence of ‘cyberflashing,’ which involves sending strangers unsolicited images of an obscene and sexual nature through online messaging platforms.³⁰² Indeed, it appears somewhat paradoxical that the exposure of a person’s genitals with ‘intent to cause fear, distress or alarm to another person’ in a public place is characterized as a criminal offence under Irish law,³⁰³ yet the distribution of images online featuring genitalia is not defined as such.

While the above arguments could be criticised as pedantic, or over-scrupulous, our law must be coherent and clear in its scope and meaning if we are to harness its expressive power as well as its coercive force.³⁰⁴ The creation of new image-based sexual offences are necessary, indeed, in a coercive sense to deter wrong behaviour, but also in an expressive sense: to legitimize the harms of the victim-survivor, articulate new behavioural norms, and engender cultural change.³⁰⁵ Just as American court rulings of the 1970s and 1980s changed the social meaning of sexual harassment in the workplace by recognising it as a form of gender discrimination, so

³⁰¹ Va. Code Ann. § 18.2–386.2 (2019).

³⁰² Sophie Gallagher, ‘What is Cyber Flashing, and Why Isn’t It illegal in England and Wales?’ (The Huffington Post, July 10 2019) <https://www.huffingtonpost.co.uk/entry/flashing-is-illegal-offline-so-why-do-we-still-tolerate-it-online_uk_5cee8d67e4b0ae67105a3ed8?utm_hp_ref=uk-cyberflashing> accessed 15th October 2019.

³⁰³ Criminal Law (Sexual Offences) Act 2017 s 45(1).

³⁰⁴ McGlynn and Rackley (n 1) 553.

³⁰⁵ *ibid.*

too can we change the meaning of sexual cyber-harassment ‘from a triviality to be ignored to invidious discrimination to be punished and remedied.’³⁰⁶ By setting just prosecutorial thresholds, affording victims of image-based sexual abuse adequate procedural protection, and ensuring the law is broad and comprehensive enough to cover technological developments, the Irish legislature can achieve just that.

³⁰⁶ Danielle Keats Citron, ‘Law’s Expressive Value in Combatting Gender Harassment,’ (2009) 108 Michigan Law Review 373, 407-410.

BibliographyTable of cases:

ABK v KDT & FGH [2013] EWHC 1192

Table of Legislation:

America:

Va. Code Ann. § 18.2–386.2 (2019)

Australia:

Crimes Amendment (Intimate Images) Act (No 29) 2017 (NSW)

Ireland:

Civil Legal Aid Act 1995

Criminal Law (Rape) Amendment Act 1990

Criminal Law (Sexual Offences) Act 2017

Harassment, Harmful Communications and Related Offences Dáil Bill (2017) 63

Mental Health Act 2001

Non-Fatal Offences Against the Person Act 1997

England and Wales:

Criminal Justice and Courts Act 2015

Scotland:

Abusive Behaviour and Sexual Harm Act 2016

Sexual Offences Act 2009

Secondary Sources:

Ayyub R, 'I Was the Victim of a Deep Fake Porn Plot Intended to Silence Me,' (The Huffington Post, 21 November 2018) <https://www.huffingtonpost.co.uk/entry/deepfake-porn_uk_5bf2c126e4b0f32bd58ba316> accessed 15 October 2019

Citron DK, 'Law's Expressive Value in Combatting Gender

Harassment,' (2009) 108 Michigan Law Review 373

Dáil Deb 16 May 2017, vol 950

Department of Communications, Climate Action and Environment,

'General Scheme Online Regulation Bill 2019,' (January 2020) <<https://www.dccae.gov.ie/en-ie/communications/legislation/Pages/General-Scheme-Online-Safety-Media-Regulation.aspx>> accessed 30 January

2020

Department of Justice and Equality, 'Minister Flanagan secures

Government Approval for Amendments to the Harassment, Harmful

Communications and Related Offences Bill' (1 May 2019) <<http://www.justice.ie/en/JELR/Pages/PR19000128>> accessed 8 October 2019

Duffy R, 'Deplorable and revolting' treatment of deceased activist Dara

Quigley is raised in the Dáil,' TheJournal.ie (May 2017) <<http://www.thejournal.ie>>

www.thejournal.ie/dara-quigley-dail-3384651-May2017/> accessed 30 January 2020.

European Agency for Fundamental Rights, *Violence Against Women: An EU-wide survey* (Publications Office of the European Union, 2015)

Farries E and Sturm T, 'Feminist legal geographies of intimate-image sexual abuse: Using copyright logic to combat the unauthorized distribution of celebrity intimate images in cyberspaces,' (2018) 51(5) EPA: Economy and Space 1145

Feehan C, 'Garda who filmed tragic journalist Dara Quigley to avoid prosecution,' Independent.ie (August 2018) <<https://www.independent.ie/irish-news/garda-who-filmed-tragic-journalist-dara-quigley-to-avoid-prosecution-37184945.html>> accessed 30 January 2020.

Gallagher S, 'What is Cyber Flashing, and Why Isn't It illegal in England and Wales?' (The Huffington Post, July 10 2019) <https://www.huffingtonpost.co.uk/entry/flashing-is-illegal-offline-so-why-do-we-still-tolerate-it-online_uk_5cee8d67e4b0ae67105a3ed8?utm_hp_ref=uk-cyberflashing> accessed 15th October 2019

Greene D, 'We Don't Need New Laws for Faked Videos, We Already Have Them.' (Electronic Frontier Foundation, 13 February 2018) <<https://www.eff.org/deeplinks/2018/02/we-dont-need-new-laws-faked-videos-we-already-have-them>> accessed 15 October 2019

Harwell D, 'Fake-porn videos are being weaponized to harass and humiliate women: Everybody is a potential target,' The Washington Post (30 December 2018) <<https://www.washingtonpost.com/technology/2018/12/30/fake-porn-videos-are-being-weaponized-harass-humiliate-women-everybody-is-potential-target/>> accessed 14th October 2019

Irish Council for Civil Liberties, 'ICCL Online Harassment Submission,' (October 2019) 3 <<https://www.iccl.ie/wp-content/uploads/2019/10/ICCL-Online-Harassment-Submission.pdf>> accessed 30 January 2020

Joint Committee on Justice and Equality Deb 23 October 2019

Law Reform Commission, Report on Harmful Communications and Digital Safety (LRC 116 – 2016)

McGlynn C and Rackley E, 'Image-Based Sexual Abuse,' (2017) 37 OJLS 534

McGlynn C and Rackley E, 'More than 'Revenge Pornography': Image-based Sexual Abuse and the Reform of Irish Law' (2017) 14 IPJ 38

Rape Crisis Network Ireland, 'Submission on the Online Harassment, Harmful Communications and Related Offences to the Joint Oireachtas

Committee on Justice and Equality' (September 2019) 2 <<https://www.rcni.ie/wp-content/uploads/RCNI-Online-Harassment-Harmful-Communications-and-Related-Offences-Bill-2017-JOCJE-Submission-September-2019-LPD-Final-2.pdf>> accessed 8 October 2019

Sherlock P, 'Revenge Pornography Victims as Young as 11, investigation finds' BBC News (27 April 2016) <<https://www.bbc.com/news/uk-england-36054273>> accessed 12 October 2019

UN Committee on the Elimination of Discrimination Against Women, 'Concluding Observations on the Sixth and Seventh Periodic Reports of Ireland' (9 March 2017) UN Doc CEDAW/C/IRL/6-7

West Coast LEAF, 'Using and Strengthening Canadian Legal Responses to Gendered Hate and Harassment Online' (June 2014) <www.clicklaw.bc.ca/resource/2867> accessed 30 January 2020