Director, Online Safety Research and Reform Section
Department of Communications and the Arts
GPO Box 2154
Canberra ACT 2601
Via email: onlinesafety@communications.gov.au
Date: 19 February 2020

Submission on the review of online safety laws

Thank you for the opportunity to make a submission on the review of the online safety laws run by the Department of Infrastructure, Transport, Regional Development and Communications.

About Australian Women Against Violence Alliance

Australian Women Against Violence Alliance (AWAVA) is one of the six National Women's Alliances funded by the Australian Government to bring together women's organisations and individuals across Australia to share information, identify issues and contribute to solutions. AWAVA's focus is on responding to and preventing violence against women and their children. AWAVA's role is to ensure that women's voices and particularly marginalised women's voices are heard by Government, and to amplify the work of its member organisations and Friends and Supporters. AWAVA's members include organisations from every State and Territory in Australia, representing domestic and family violence services, sexual assault services, services for women in the sex industry and women's legal services, as well as organisations representing Aboriginal and Torres Strait Islander women, young women, women educators and other groups. AWAVA's contract manager is the Women's Services Network (WESNET).

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Introduction

AWAVA welcomes a public consultation on new online safety laws and a move to harmonise the legislation in order to better respond to abuse perpetrated online. Overall we are supportive of the proposed legislative changes. As the National Women's Alliances tasked with providing input on policy aiming to prevent and respond to different manifestations of violence against women, in this submission we are highlighting the need to embed an intersectional gender lens to social policy and legislation on online safety.

Technology-facilitated abuse in its all manifestations is driven by an intention to harass, stalk, groom, monitor, conduct surveillance on, location-track, threaten, humiliate, impersonate and/or isolate a person. In gender-based violence against women, it can be understood as another tool used by perpetrators to hold power and control over a victim/survivor. In some cases, technology significantly increases the impact of abusive behaviours because of the increased capacity or reach of technologies being used compared to "traditional" forms of these behaviours.[1] As an early article on technology abuse states "Technology has given [abusers] new tools, enabling them to reach their victims from afar while infiltrating even deeper into their victims' everyday lives".[2]

The intersection between technology and violence against women has been already established. This is evidenced by both US and Australian studies, and indicate that that 97-98% of domestic and family violence practitioners surveyed had clients experiencing technology-facilitated abuse.[3] Technology-facilitated abuse also happens outside of intimate relationships in the forms of image-based abuse and cyberbullying. We note that the discussion paper responds to those manifestations and also cites available research on how diverse groups of people are impacted by this abuse. However, we regret to see that this does not translate into an intersectional gender lens incorporating both prevention and responses. Further in the submission we elaborate on what it could mean in practice.

We also note that the Fourth Action Plan of the National Plan to Reduce Violence Against Women and their Children (National Plan) running from 2019 to 2022 has two specific measures to address technology-facilitated abuse. This includes development of resources on technology-facilitated abuse for Aboriginal and Torres Strait Islander women[4] and women with disabilities.[5] We strongly believe that all activities undertaken by the eSafety Commissioner that address violence against women must align with the National Plan and ensure meaningful participation of diverse group of women and specialist women's services.

Lastly, when developing policies and legislation that affect all people in Australia, it is important that communication about it is accessible and inclusive of all. We note that the discussion paper uses the language of "Australian people" that in itself is excluding those residents who are not Australian citizens. It also can send a wrong message to perpetrators that if they are not Australian citizens their actions can be

[1] Southworth, C. et al. (2006) An High-Tech Twist on Abuse: Technology, Intimate Partner Stalking and Advocacy, Violence Against Women Online Resources, June 1, p1–16.

[2] Fraser, C. et al. (2010) The New Age of Stalking: Technological Implications for Stalking, Juvenile and Family Court Journal 61, no. 4: 39–55,

[3] Domestic Violence Resource Centre Victoria (2015) ReCharge: Women's Technology Safety, Legal Resources, Research & Training: National Study Findings, available online at http://www.smartsafe.org.au/sites/default/files/National-study-findings-2015.pdf; Domestic Violence Resource Centre Victoria (2013) SmartSafe Research Findings, available online at www.smartsafe.org.au; Woodlock, D. (2017) The Abuse of Technology in Domestic Violence and Stalking, Violence Against Women 23, no. 5: 584–602; National Network to End Domestic Violence (2014) A Glimpse From the Field, Safety Net Technology Safety Survey 2014, available at http://static1.squarespace.com/static/51dc541ce4b03ebab8c5c88c/t/54e3d1b6e4b08500fcb455a0/1424216502058/NNEDV_Glimpse+From+the+Field+-+2014.pdf; National Network to End Domestic Violence (2018) Tech Abuse: Information From the Field, Techsafety.org, Washington, D.C., available online at https://www.techsafety.org/blog/2018/9/12/tech-abuse-information-from-the-field.

[4] For more information see: https://plan4womenssafety.dss.gov.au/initiative/resources-on-technology-facilitated-abuse-for-aboriginal-and-torres-strait-islander-women/

[5] For more information see: https://plan4womenssafety.dss.gov.au/initiative/resources-on-technology-facilitated-abuse-for-women-with-disability/

excused and no accountability will be enforced. It is important that there is an inclusive message articulated that all people in Australia regardless of their migration status will be protected from online abuse, as well as held accountable for the use of this violence.

Comments on the objectives of the Online Safety Act

> **Consultation questions:**
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> 1. Are the proposed high level objects appropriate? Are there any additions or alternatives that are warranted?
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> 2. Is the proposed statement of regulatory policy sufficiently broad to address online harms in Australia? Are there aspects of the proposed principles that should be modified or omitted, or are there other principles that should be considered?

One of the proposed high level objectives of the Online Safety Act is "[to] provide a responsive and flexible approach to online safety". While AWAVA is supportive of such an objective, it must embed an intersectional gender lens. We recommend amending the objective to read as follows: '[to] provide a responsive and flexible approach to online safety incorporating an intersectional gender lens'.

Why incorporate an intersectional gender lens in legislation and policy?

It has been well established that social policy that mainstreams gender and intersectionality removes structural barriers that impede safety and equality for diverse groups in society.[6] The Fourth Action Plan has committed to taking an intersectional approach to prevention and responses to violence against women.[7] Internationally, both the Human Rights Council and the United Nations General Assembly also affirmed the imperative of addressing "multiple, intersecting and aggravating forms of discrimination" and violence against women.[8]

The mainstreaming of an intersectional gender lens enables to work effectively to address various social inequality, disadvantage and discrimination that people experience.[9] It allows to move beyond a simple recounting of who is more at risk, to an evaluation of whether current or proposed measures reduce structural inequality between different members of society and produce equitable outcomes or they instead exacerbate it. The mainstreaming of an intersectional gender lens means that while a legislation or a policy is targeted at the whole of society, it is able to meaningfully engage and respond to diverse circumstances of all people in their diversity.[10] Simultaneously, it is able to take into account specific circumstances and drivers, in this instance of online abuse, as well as its impacts.

This means that while violence against women in general, and image-based abuse or cyberbullying when particularly directed at women is driven by gender inequality, it is also compounded by other structural forms of discrimination such as racism, ableism, or transphobia (among many). Thus, the impacts will also differ. For instance, for some population groups such as LGBTIQ+ people it may have severe impacts on their mental health in the settings where homophobia and transphobia are prevalent both in real life and online. Thus, this may exacerbate the risks of suicide (we discuss this in the section on cyberbullying

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[6] McPhail, B. A. (2003) A Feminist Policy Analysis Framework: Through a Gendered Lens. The Social Policy Journal., vol. 2(2/3)

[7] See: https://plan4womenssafety.dss.gov.au/the-national-plan/fourth-action-plan/

[8] 2017, A/HRC/RES/35/18, HRC Resolution 35/18, Elimination of discrimination against women and girls, OP. 10; 2017, A/RES/71/170, GA Resolution 71/170, Intensification of efforts to prevent and eliminate all forms of violence against women and girls: domestic violence, OP.11.

[9] Our Watch, Organisational Strategy to Strengthen our Intersectional Approach 2018-2020.

[10] VIC Health Applying a gender lens in the workplace. Learnings from the Generating Equality and Respect program.

scheme). Understanding of such negative impacts through an intersectional gender lens must be reflected in how the online abuse is dealt with.

Recommendation:

We recommend that the Australian Government:

1. Embed an intersectional gender lens in policy and legislation aimed at responding to online abuse.

Comments on the proposal to establish a new cyber abuse scheme for adults

> **Consultation questions:**
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> 13. Do the proposed elements of a definition of adult cyber abuse appropriately balance the protection from harms with the expectation that adults should be able to express views freely, including robust differences of opinion?

Gendered drivers of cyber abuse

AWAVA welcomes a proposal to establish a new cyber abuse scheme for adults. In 2017 we made a submission on the cyberbullying amendments in the Criminal Code as well as appeared before the Senate Committee to argue that cyberbullying affects not only children but adults too.[11] We also argued that cyberbullying as a phenomenon is gendered.

Over the recent years, there have been several studies conducted looking into the gendered nature of cyberbullying. Duggan et al. (2014)[12] found that women were more likely than men to experience more severe forms of online harassment, such as sexual harassment and stalking. Another study found that men are more likely to perpetrate cyberbullying, but women are more likely to be victimised.[13] We note that the discussion paper references some of additional studies too.

Beyond a simple gender disaggregation between victims/survivors and perpetrators, it is also important to investigate the more complex question of "how acquired gender-related beliefs can be linked to cyberbullying".[14] While the analysis of the available research finds that all genders can be both perpetrators and victims/survivors, there were a number of conclusions made that allow us to understand better the gendered nature of cyberbullying.

First, despite varying research outcomes, most of the work in this area has shown the majority of victims/survivors are women.[15] Second, while more men are exposed to cyberbullying entailing physical aggression, more women are victims of cyberbullying that includes non-consensual sharing of intimate images, unsolicited sending of sexual and pornographic images and other forms of cyberbullying entailing sexualised behaviour.[16] Third, the impacts of this behaviour are gendered as it is rooted in outdated stereotypes about gender roles, sexuality and sexual norms for women. For example, the non-consensual sharing of intimate images, and the threat to share such images, occurs in the context of the sexual double

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[11] AWAVA (2017) Submission on the adequacy of existing offences to capture cyberbullying, available at: Submission on the adequacy of existing offences to capture cyberbullying https://awava.org.au/2018/02/09/submissions/submission-cyberbullying?doing_wp_cron=1580938986.7502489089965820312500

[12] Duggan, M., Rainie, L., Smith, A., Funk, C., Lenhart, A., & Madden, M. (2014, October). Online harrassment. Pew Research Center. Retrieved from http://www.pewinternet.org/files/2014/10/PI_OnlineHarassment_102214_pdf1.pdf.

[13] Sourander, A., Klomek, A. B., Ikonen, M., Lindroos, J., Luntamo, T., Koskelainen, M., et al. (2010). Psychosocial risk factors associated with cyberbullying among adolescents: A population-based study. Archives of General Psychiatry, 67, 720e728. http://dx.doi.org/10.1001/archgenpsychiatry.2010.79.

[14] R.Navarro et al. (eds). Cyberbullying across the Globe, Chapter 2 Gender Issues and Cyberbullying in Children and Adolescents: From Gender Differences to Gender Identity Matters.

[15] Henry N., Powell A. (2016) Sexual Violence in the Digital Age: The Scope and Limits of Criminal Law Social & Legal Studies, Vol. 25(4) 397–418

[16] Cassidy, W., Brown, K., & Jackson, M. (2012). 'Under the radar': Educators and cyberbullying in schools. School Psychology International, 33(5), 520–532. doi:10.1177/0143034312445245

standard, which unfairly judges women but not men for enjoying their sexuality, and is often a dimension of controlling/coercive behaviour in ongoing relationships as well as relationships that are breaking down or have ended.[17] There are also forms of online abuse such as shaming girls for their appearance, which relate to the underlying gender dynamics that drive violence against women. For example, Brody and Vangelisti write that "women were more likely than men to be targeted by topics relating to sex. Men were more likely to be bullied using messages linked to their sexual orientation (e.g., homophobic slurs) or skills/talents (e.g., insulting their artwork)."[18]

Finally, the underlying cause of violence inflicted through technology lies in the "social and structural context of gender hierarchisation",[19] in other words, power relations between men and women as well as other intersecting social groupings, the dominant position of men over women, and the desire for control and coercion.

In short, violence and bullying generally are strongly interlinked with dynamics of gender and sexuality. The normalisation of male violence and restrictive expectations about women and girls are some of the key drivers of violence and bullying generally. This must be addressed in approaches to respond to cyberbullying.

Intersectional drivers and heightened impacts of cyber abuse

The discussion paper has also addressed to some extent groups who are more at risk of cyberbullying. When mainstreaming an intersectional gender lens, it becomes apparent that impacts of cyberbullying will differ and may be more severe for different group. Reports over the last 10 years indicate that from 60 to 80 per cent of people who identify as LGBTIQ+ have experienced homophobic abuse including cyberbullying.[20] Transgender women and men experience significantly higher rates of non-physical and physical abuse compared with women and men who identify as homosexual.[21] The National LGBTI Health Alliance states that LGBTI young people aged 16 to 27 are five times more likely to attempt suicide.[22] When experienced bullying and harassment, the risk is higher.

Chatrooms have been identified as the place where young LGBTIQ+ people are most likely to feel threatened.[23] The incidence of cyberbullying has increased greatly in recent years with the proliferation of online social networking tools.[24] There have been high profile cases of LGBTIQ+ young people being bullied and harassed online that have resulted in self-harm and suicide.[25]

Henry and Powell also found that people with disabilities and Aboriginal and Torres Strait Islander people are among populations vulnerable to the increased rates of technology-facilitated abuse. The suicide rate amongst Aboriginal and Torres Strait Islander peoples is more than double the national rate.[26]

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[17] Ringrose, J., Gill, R., Livingstone, S. & Harvey, L. 'A qualitative study of children, young people and 'sexting': a report prepared for the NSPCC'. National Society for the Prevention of Cruelty to Children, London, UK 2012.

[18] Brody, N., Vangelisti, A. L. (2017) Cyberbullying: topics, strategies and sex differences. Computer in Human Behaviour 75 (2017), p. 739-748.

[19] Ringrose, J., Gill, R., Livingstone, S. & Harvey, L. 'A qualitative study of children, young people and 'sexting': a report prepared for the NSPCC'. National Society for the Prevention of Cruelty to Children, London, UK 2012.

[20] Australian Research Centre in Sex, Health and Society, La Trobe University, Writing Themselves in 3: The third national study on the sexual health and wellbeing of same sex attracted and gender questioning young people(2010); ACON, Submission to the House of Representatives Standing Committee on Family, Community, Housing and Youth inquiry into the impact of violence on young Australians (2009), p.4; Also see Tomsen & Mason 2001; Australian Human Rights Commission Violence, Harassment and Bullying and the LGBTI Communities https://bullying.humanrights.gov.au/sites/default/files/content/pdf/bullying/VHB_LGBTI.pdf

[21] Australian Research Centre in Sex, Health and Society, La Trobe University, Writing Themselves in 3: The third national study on the sexual health and wellbeing of same sex attracted and gender questioning young people(2010);

[22] See National LGBTI Health Alliance http://lgbtihealth.org.au/statistics/#_ftn1

[23] Hillier, Horsely and Kurdas, "It made me feel braver, I was no longer alone': The Internet and same sex attracted young people, published in J. Nieto. Sexuality in the Pacific, Spanish Association of studies in the Pacific, 2004, p15.

[24] Shaheen Shariff (2008) Cyber-bullying: Issues and Solutions for the School, the Classroom and the Home

[25] See for example, J Schwartx., 'Bullying, Suicide, Punishment', New York Times, 2 October, 2010. At www.nytimes.com/2010/10/03/weekinreview/03schwartz.html?_r=1&ref=tyler_clementi

[26] See https://www.lifeline.org.au/about-lifeline/lifeline-information/statistics-on-suicide-in-australia

The discussion paper proposes the focus of the new scheme will be "on serious cases of abuse, recognising that adults can be expected to demonstrate a higher level of resilience and maturity than children, and that it will be important to avoid creating an unreasonable regulatory burden."[27] We believe that it is important to address the heightened impacts mentioned above in the policy on online abuse.

Definition of cyber abuse to account for coercive control

In situations of domestic and family violence, cyber abuse is driven by coercive control and is a part of complex pattern of behaviours aimed at controlling the life of a victim/survivor. Instances of cyber abuse in such cases may be ongoing, aimed at creating an atmosphere of a constant surveillance and control. They may also not include any direct threats, but, for instance, track one's location. In situations of domestic and family violence, a definition of cyber abuse that proposes 'an ordinary reasonable person' perception test would miss the elements of coercive control, and thus unintentionally exclude a range of behaviours that are perpetuated in the context of domestic and family violence. A limited definition may lead to victims/survivors not reporting cyber abuse, particularly in cases where they may not be able to identify their own experiences as constituting abuse or family violence.

The definition as it stands at the moment also does not account for a cumulative impact of such behaviours, where a single incident may not amount to causing 'serious distress or serious harm', yet cumulatively constitutes a pattern of abusive behaviour.

Recommendation:

We recommend that the Australian Government:

2. In pursuing law reform, consider how criminal penalties can work together with antidiscrimination laws to treat cyberbullying on the grounds of sexuality, culture, race, gender, disability and religion as particularly serious offences.

Comments on non-consensual sharing of intimate images (image-based abuse)

> Consultation questions:
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> 17. Does the image-based abuse scheme require any other modifications or updates to remain fit for purpose?

Non-consensual sharing of intimate images has damaging consequences that go beyond its potential impact on reputations and career prospects. Research has found that technology-facilitated abuse, including the non-consensual sharing of intimate images, or the threat of sharing such images, can traumatise and isolate victims and constitutes a major barrier to the full enjoyment of social life and autonomy.[28] Online interactions now constitute a major dimension of social life for many people, and the unauthorised sharing of intimate images can traumatise and isolate victims, which is often the intention of those who share the images. Furthermore, the non-consensual sharing of intimate images, or the threat to share such images, is increasingly used as a tactic of control in abusive relationships and in the perpetration of sexual assault. More generally it also manifests and reaffirms the means of maintaining male privilege and power.

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[27] Page 32 of the discussion paper.

[28] See: Anastasia Powell & Nicola Henry (2016): Policing technology-facilitated sexual violence against adult victims: police and service sector perspectives, Policing and Society, DOI:10.1080/10439463.2016.1154964; Henry, N., Powell A. (2015) Beyond the 'sext': Technology facilitated sexual violence and harassment against adult women. Australian & New Zealand Journal of Criminology. Vol. 48(1) 104–118; Henry N., Powell A. (2016) Sexual Violence in the Digital Age: The Scope and Limits of Criminal Law Social & Legal Studies, Vol. 25(4) 397–418; Henry N., Powell A. (2015) Embodied Harms: Gender, Shame, and Technology-Facilitated Sexual Violence. Violence Against Women, Vol. 21(6) 758–779; McGlynn, C., Rackley, E. (2017) Image-Based Sexual Abuse. Oxford Journal of Legal Studies, Vol. 37, No. 3, pp. 534–561; Henry, N., Powell A., Flynn A. (2017) Not Just 'Revenge Pornography': Australians' Experiences of Image-Based Abuse. A SUMMARY REPORT. RMIT University. Available at https://www.rmit.edu.au/news/all-news/2017/may/not-just-_revenge-porn--image-based-abuse-hits-1-in-5-australian.

Given long-lasting impacts of the non-consensual sharing of intimate images, during previous consultations AWAVA expressed our position that penalties for the use of this violence must be criminal.[29] We continue to support criminalisation of non-consensual sharing of intimate images. Penalties for the offence should be substantial, reflecting the harm caused and the need to deter potential offenders. It should also focus on the potential harm caused to the victim, rather than the intention of the offender, with culpability framed in terms of recklessness with regard to the likely impacts on the victim, rather than depending on intention per se, which can be difficult to establish. [30]

In addition, it is important the definition of an intimate image is inclusive. The current Enhancing Online Safety Act, Section 9B includes a depiction of person without attire of religious or cultural significance in the definition of an intimate image. The discussion paper in its proposals does not address this. We believe it is important to expand a definition of an intimate image in the new Online Safety Act to include attire of religious or cultural significance.

Lastly, it is important that people using the civil penalties regime and applying for an image to be removed are aware that once it is removed, they will lose the evidence of this abusive behaviour. In the context of domestic and family violence, where technology-facilitated abuse constitutes a part of the complex violent actions and where criminal proceedings are in place, such loss of evidence may be to the detriment of a victim/survivor. It is important that this is clearly articulated by the Office of the eSafety Commissioner.

Recommendation:

We recommend that the Australian Government:

3. Expand a definition of an intimate image to include a depiction of a person without attire of religious or cultural significance.

Other comments

With an increasing use of technology and high prevalence of online abuse, it is important that the Office of the eSafety Commissioner itself embeds and mainstreams an intersectional gender lens in all its work including with children. All staff in particular those who are tasked with assessing materials that are reported must be trained on gendered and intersectional drivers of violence against women in order to be better equipped to respond to reports of online abuse. Such training needs to be mandatory and ongoing. Such training needs to include the following topics:

- the nature and dynamics of domestic and family violence, including at an intersection with technology;
- cultural competency and safety (working with Aboriginal and Torres Strait Islander people and people from culturally and linguistically diverse backgrounds);
- working with people who identify as LGBTIQ;
- disability awareness and accessibility; and
- intersectionality of clients' needs that includes recognition of structural inequalities arising from the interconnectedness of gender, age, sexuality, disability, culture, religion, race and/or other experiences.

Police training is important in ensuring their ability to investigate and prosecute perpetrators, as well increasing public trust in obtaining justice in the instances of technology-facilitated abuse. There is also a

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[29] AWAVA (2016) Submission to the Senate inquiry into "the phenomenon colloquially referred to as 'revenge porn'"; available at: https://awava.org.au/2016/01/14/submissions/7271?doing_wp_cron=1580942221.0472540855407714843750; AWAVA (2017) Submission on the proposed civil penalties regime for non-consensual sharing of intimate images; available at: https://awava.org.au/2017/07/20/submissions/8315?doing_wp_cron=1580942208.2345860004425048828125
[30] http://awava.org.au/wp-content/uploads/2016/04/AWAVA-submision-to-Senate-inquiry-on-phenomenon-colloquially-referred-to-as-revenge-porn-Jan-2016.pdf

need to review and improve existing investigation techniques and models and ensure resourcing of specialist units within state and territory police. Powell and Henry argue that police lack sufficient training to cope with the increased rates of crimes committed in the online realm.[31]

AWAVA's members report that often there are difficulties experienced in obtaining evidence which can be relied upon for successful prosecution. In these cases, police rely on cooperation from the industry in the absence of formal procedures in relation to having access to evidence. The process may take many months. In the USA, for instance, there are mechanisms in place that allow to obtain evidence from social media platforms about perpetuated abuse. It is essential that mechanisms are in place that require social media and other internet platforms to provide evidence and collaborate with criminal inquiries (also see image-based abuse section of this submission).

It is equally important to train lawyers and appropriate magistrates on violence against women and technology-facilitated abuse. We refer you to the Safety Net Australia, a project run by WESNET for training available[32] as a best practice in the area.

Resources are required for police and frontline worker training and for a place where victims/survivors can go to get technical support as well as access to practical and legal support.[33]

Despite the high prevalence of technology-facilitated abuse and broad agreement about the need to criminalise these types of behaviours, Henry and Powell argue that the Australian public still holds attitudes that amount to victim-blaming. Their survey has pointed to a serious need for an awareness raising campaign aimed at producing relevant information for victims, encouraging 'bystander' and 'witness' actions and challenging the culture of victim-blaming.[34]

Recommendations:

We recommend that the Australian Government:

4. Ensure that the Office of eSafety Commissioner mainstreams an intersectionality and gender lenses throughout all their work.

5. Ensure that the Office of eSafety Commissioner provides ongoing training and professional development for all relevant staff on intersectional and gender drivers of violence against women including online abuse.

6. Ensure ongoing training and professional development for magistrates, lawyers and police on violence against women and technology

7. Ensure ongoing training, professional development and resources for frontline workers and service providers on violence against women and technology.

8. Invests in community awareness and attitude change on violence against women that is culturally competent, accessible and inclusive and addresses drivers of online abuse.

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[31] Anastasia Powell & Nicola Henry (2016): Policing technology-facilitated sexual violence against adult victims: police and service sector perspectives, Policing and Society.

[32] See https://wesnet.org.au/safetynet/

[33] Snell, L. (2017) Recording and sharing intimate images without consent. Law Society Journal 36. Available at http://www.wlsnsw.org.au/wp-content/uploads/Image-based-abuse-LSJ-Aug-17.pdf

[34] Henry, N., Powell A., Flynn A. (2017) Not Just 'Revenge Pornography': Australians' Experiences of Image-Based Abuse. A SUMMARY REPORT. RMIT University. Available at https://www.rmit.edu.au/news/all-news/2017/may/not-just-_revenge-porn--image-based-abuse-hits-1-in-5-australian

We thank you for the opportunity to provide input to this consultation. If you would like to discuss the contents of the submission further, please contact Dr Merrindahl Andrew, AWAVA Program Manager, using the details below.

Dr Merrindahl Andrew

Program Manager | Australian Women Against Violence Alliance

www.awava.org.au | █████████████████████████