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Committee Secretary
Senate Legal and Constitutional Affairs Committee
Parliament House
Canberra, ACT 2600

Dear Committee Secretary,

Re: Inquiry into the phenomenon colloquially referred to as 'revenge porn', which involves sharing private sexual images and recordings of a person without their consent, with the intention to cause that person harm

Thank you for this opportunity to comment on the Legal and Constitutional Affairs References Committee's Inquiry into 'revenge pornography'. We are Dr Nicola Henry, Senior Lecturer in Crime, Justice and Legal Studies (La Trobe University), Dr Asher Flynn, Senior Lecturer in Criminology (Monash University) and Dr Anastasia Powell, Senior Lecturer in Justice and Legal Studies (RMIT University).

We are currently collaborating on research examining the non-consensual distribution of intimate or sexually explicit digital images of adults. Our research represents the first Australian empirical study to investigate the phenomenon of revenge pornography, focusing on the nature, impacts and prevalence of revenge porn, as well as implications for Australian legal responses (funded by La Trobe University and a Criminology Research Council Grant, CRG08-16/17).

The aims of this research are to:

(1) Examine the scope and impacts of criminal legislation;
(2) Generate information on the prevalence of revenge pornography among Australian adults; and
(3) Investigate the impacts of these harms on adult victims.

Dr Powell and Dr Henry have also recently completed an Australian Research Council Discovery Project (DP130103094) on technology-facilitated sexual violence and harassment (TFSV). This project uncovered a range of adult experiences of technology-mediated sexual violence, digital

harassment abuse, and analysed the effectiveness of legal and policy frameworks for responding to these new and emerging harms. In the first Australian survey on online abuse and harassment, we found that 1 in 10 Australians had a nude or semi-nude image of them distributed online or sent onto others without their permission (Powell & Henry 2015). As our research was not focused on 'revenge pornography' in particular, our survey did not explore further the context in which nude or semi-nude images were shared without permission. More research is thus needed to understand the prevalence, nature, and impacts of image-based sexual exploitation. This is the gap we are seeking to address in our current research specifically focused on revenge pornography.

Previously, we have provided comment on legal responses (both criminal and civil) to non-consensual imagery to the: Australian Law Reform Commission Inquiry into *Serious Invasions of Privacy in the Digital Era* (2014); to the NSW Parliamentary Law and Justice Committee's *Serious Invasions of Privacy Inquiry* (2015, at which we also presented evidence in person); and we provided guidance on the exposure draft of the *Criminal Code Amendment (Private Sexual Material) Bill 2015* (MP Tim Watts).

Our comments below indicate that we are supportive of specific federal legislation that criminalises revenge pornography type behaviours including: images of sexual assault; images obtained from the use of a hidden device to record another person; stolen or hacked images from a person's computer or other device; photo-shopped images; and images obtained consensually in the context of a relationship with another person. We also support that such offences should cover not only distributors of the images and those who *threaten* to distribute images, but also website operators who host revenge pornography sites.

Our submission below first explores the problematic term 'revenge pornography' to indicate the diversity of behaviours and the harms that may be experienced. The second section describes the existing legislation in Australian jurisdictions, and the third section examines the potentials and limitations of a new federal offence (should one be introduced). The final section discusses prevention and measures we believe are required beyond that of the criminal law.

We are available to discuss this submission in more detail, if required.

1. 'Revenge Pornography'

Revenge pornography is a media-generated term used to describe the distribution of sexually explicit or intimate images of another person without their consent. While we support attention being directed towards this harmful conduct and for legislative intervention as a response, we contend that the term 'revenge pornography' is a misnomer since not all perpetrators are motivated by feelings of revenge, and not all content constitutes or serves the purpose of 'pornography'. Indeed, labelling such images pornographic may in fact be highly offensive to victims. Some scholars have alternatively labelled the behaviour as 'non-consensual pornography' (Citron & Franks 2014; Franks 2015), 'involuntary porn' (Burns 2015), or 'non-consensual sexting' (see Henry & Powell 2015a). However, these alternate terms are also problematic, in part because they tend to focus on the behaviour of the victim (e.g. the voluntariness of the creation and/or distribution of the image) rather than on either the *abusive impacts* of the behaviour, or the *perpetrator's actions* as a form of sexual violation or exploitation.

Consequently, we prefer to name these harmful behaviours as they are –a form of *image-based sexual exploitation* (Henry & Powell 2016). Such a term better captures the diverse range of harmful behaviours increasingly reported by victims and allows for clearer distinctions between child sexual exploitation material and adult victims of image-based sexual exploitation, which are not distinct in current terminology. However, recognising that such a term does not currently carry significance in broader public understanding and debates on this issue, we use the term 'revenge pornography' in our response below and in the research that we do.

Leaving aside definitional issues, it is important to state that revenge pornography includes a wide range of behaviours and motivations. It includes images originally produced or obtained with and without the consent of the victim, and may involve: images obtained (consensually or otherwise) in an intimate relationship; photographs or videos of sexual assault/s; images obtained from the use of hidden devices to record another person; stolen images from the Cloud or a person's computer or other device; and pornographic or sexually explicit images that have been photo-shopped, showing the victim's face. While these wrongs are often perpetrated by jilted lovers who distribute or threaten to distribute images to get 'revenge' on their partner or ex-partner, revenge porn can also involve acquaintances or strangers who distribute images in order to coerce, blackmail, humiliate or embarrass another person, or those who distribute images for sexual gratification, fun, social notoriety or financial gain.

The methods of distribution are likewise diverse, including text message or email to family, friends, colleagues, employers and/or strangers; uploading images to pornography websites, including mainstream pornography sites, or specifically designed revenge pornography or 'ex-girlfriend porn' websites; uploading images onto social media, thread or imageboard websites; or more traditional means of distributing images in public places, such as through the post, letterboxes or public spaces.

Revenge pornography has been increasingly identified as a significant and serious problem, warranting substantial legislative reform and non-legal remedies (Citron & Franks 2014; Henry & Powell 2015a). While the non-consensual distribution of intimate images may not cause much harm to some individuals, context and circumstances may lead to profound, adverse and long-lasting impacts for many victims. For example, victims may be at risk of stalking if their personal details are revealed next to their images online or if information underneath their images incites others to make sexual demands of them in person. Images may be shared or distributed to children, intimate partners, family members, friends, colleagues and strangers, resulting in feelings of shame and humiliation to both the victim and their significant others. This may substantially affect relationships with others, including leading to a loss of employment or future employment prospects and relationship breakdown. Images are also being distributed (or threats are being used to distribute images) in domestic violence contexts, meaning that victims may be forced to engage in non-consensual acts, stay in the relationship or refrain from pursuing criminal charges or an intervention order. This adds a significant burden on victims who may already find it difficult to leave their violent partners (Henry & Powell 2015a). Like sexual violence generally, victims may be blamed for engaging in certain behaviours, including those who consent to having their photograph or video taken by another person, or those victims who take the image themselves. Victim-blaming is likely to exacerbate these diverse social, financial and psychological impacts.

Overall, victims may feel unsafe in their own homes and may suffer significant emotional distress. They may retreat from engaging in both offline and online social activities. They may suffer anxiety, depression and a host of other psychological problems as a result of knowing that their images are

out in cyberspace and that they have little control over who possesses these images, or whether those images are being continually distributed thereafter (Flynn et al 2015). To add to these concerns, the effect of revenge pornography in society more generally is to consolidate the idea that the bodies of women and girls, as well as other sexual minorities, are available for objectification and consumption (see Henry & Powell 2015b).

In the absence of legislation criminalising these wrongs, victims have little access to justice.

2. Existing Australian Legislation

Broader offences currently exist under the *Criminal Code Act 1995* (Cth), including the use of a carriage service to menace, harass or cause offence (s 474.17). However, this offence is too broad in scope to capture the types of harms caused when intimate or sexually explicit images are distributed or disseminated without consent. To our knowledge, this charge has only been used once in relation to 'revenge pornography' behaviours (see *R v Daniel McDonald and Dylan Deblaquiere* [2013] ACTSC 122). While some stakeholders in the Australian Law Reform Commission's (ALRC) (2014) *Serious Invasions of Privacy in the Digital Era* were of the view that the breadth of the telecommunications law is its strength, and that this offence is perfectly adequate in terms of capturing a wide range of behaviours (including revenge pornography), others expressed the view that this law is not widely known or actively enforced. In the semi-structured interviews for our ARC project on technology-facilitated sexual violence and harassment, respondents often pointed out that this offence is rarely used in relation to revenge pornography and that the introduction of a more specific offence was therefore desirable. This concern has been also expressed by the Commonwealth Director of Public Prosecutions who warned that '[existing] federal laws are not properly protecting women from so called "revenge porn" attacks by aggrieved ex-lovers' (Wilson 2016).

Despite the absence of legislation at the federal level, two Australian jurisdictions to date have introduced revenge pornography offences. In 2013, South Australia made distributing an 'invasive image' without consent a criminal offence under its *Summary Offences Act 1953* (SA). Perpetrators face a maximum of two years' imprisonment if it can be proven that the distributor knew or should have known that the victim did not consent. 'Invasive image' is defined as a 'moving or still image of a person – (a) engaged in private act; or (b) in a state of undress such that the person's bare genital or anal region is visible'. In 2014, Victoria introduced more specific revenge pornography legislation, making it a criminal offence to maliciously distribute, or threaten to distribute, 'intimate' images without consent under the *Summary Offences Act 1966* (Vic). The maximum penalty is 2 years' imprisonment for distribution and 1 year imprisonment for threat of distribution.

In other Australian state/territory jurisdictions, offences exist in relation to stalking, blackmail, voyeurism or indecency laws. However, these existing laws are too broad in scope to capture the types of harms caused when intimate images are distributed online without consent.

In the absence of specific criminal legislation at the state, territory and federal levels, the only other legal avenues for victims of revenge pornography can be found in the civil law. Unfortunately, existing civil laws are inherently limited in addressing revenge pornography for a number of reasons. First, these laws are ill-suited in their applicability and language to revenge pornography. Second, there are significant costs associated with civil litigation for ordinary Australians who may not have the financial means to bring civil action. And third, the civil laws arguably privatise the issue of

revenge pornography and do not serve as an effective deterrent against future behaviours. The harms associated with revenge pornography (as described above) further warrant it being specifically classified as a federal telecommunications offence.

3. Introducing Specific Federal Offences: Issues for Consideration

Below we discuss the following issues for consideration should a specific federal offence be introduced: (i) terminology; (ii) coverage; (iii) perpetrator intention and harm caused; (iv) threats to share intimate images; and (v) operating a revenge porn website.

(i) Terminology

It is important if a specific federal offence is introduced, that the most appropriate terms are used to capture the wide variety of behaviours that fit under the umbrella term 'revenge pornography', and that adequate definitions of such terms are provided. Three terms we discuss here are: 'intimate images', 'distribution' and 'consent'.

First, we agree that 'sexual images' may be too narrow and ambiguous because of confusion over what would constitute a sexual image. A similar argument has been made by UK Professors Clare McGlynn and Erika Rackley (2015) in relation to the *Criminal Justice and Courts Act 2015* (England and Wales) which defines images as 'private and sexual'. We agree that the term 'intimate' might also be problematic because it is overly broad; for instance, it might capture an image of two people kissing, an image of someone in their underwear or sunbathing on a beach, or even someone going to the toilet. The Victorian law, however, addresses this ambiguity somewhat by defining the meaning of 'intimate image' as 'a moving or still image that depicts (a) a person engaged in sexual activity; (b) a person in a manner or content that is sexual; or (c) the genital or anal region of a person, or, in the case of a female, the breasts'. The Victorian legislation also states that community standards of acceptable conduct must be taken into account, including regard for the nature and content of the image, the circumstances in which the image was captured and distributed, and any circumstances of the person depicted in the image, including the degree to which their privacy has been affected.

Although there remain questions about how 'a person in a manner or content that is sexual' will be interpreted, we believe 'intimate images' is the most appropriate term and the most effective way of ensuring that both breadth and clarity are covered. The use of 'intimate images' better captures nude (or semi-nude), sexually explicit, or otherwise private images, and it also reflects the wording used in criminal legislation in some international jurisdictions. We would also support the definition to also include the female breasts of a person who identifies as a woman (e.g. a transgender or intersex person). Consideration may also need to be given to cultural-specific contexts in defining intimate images. For example a photograph of a Muslim woman without her hijab on may, in some contexts, be considered an intimate image. There is a need to ensure flexibility in the legislation for judicial interpretation of these circumstances, however the definition should not be too broad to capture all potentially 'intimate' images.

Second, although 'distribute', 'disclose' or 'disseminate' appears in different laws internationally on this matter, the law needs to be clear about what distribution, disclosure or dissemination means. For instance, do these terms equally apply where a hidden device is used to record another person without their knowledge engaging in a sex act? Does showing another person a picture on a mobile

phone (but not actually pressing send) mean the same thing as 'distribute'? We believe there is need for the federal legislation to include a clearer definition than the one contained in s 40 of the *Summary Offences Act 1996* (Vic) (which is similar to the South Australian definition) which defines 'distribute' as 'publish, exhibit, communicate, send, supply or transmit to any other person, whether to a particular person or not'. It is not clear, for instance, whether 'communicate' could mean 'showing' another person an image. Any new offence should clearly state that distribution can mean sharing and showing, and that it is irrelevant whether it is distributed to one person or millions of people.

Under South Australian legislation, it is a defence if the conduct constituting the offence was 'for the purpose connected to law enforcement' or was 'for medical, legal or scientific purpose, or if the image was filmed by a licenced investigation agent for the purpose of obtaining evidence in a particular context' (s 26C). Federal legislation should also clearly state that the law does not apply if someone has posed naked in a magazine or in another commercial setting (see also the exemptions outlined in the *Summary Offences Act 1996* (Vic) s 41D).

Finally, another term that requires a clear explanation in any new legislation introduced is that of consent. The Victorian legislation contains a number of exemptions to help clarify consent. For example, under s41 DA (3)(b), the law does not apply, if 'B had expressly or impliedly consented, or could reasonably be considered to have expressly or impliedly consent to – (i) the distribution of the intimate image; and (ii) the manner in which the intimate image was distributed'. However, given the relatively new nature of this Victorian offence, how consent has been interpreted under this provision remains to be seen. New legislation should make it clear that consent can be given specifically, generally, expressly or by implication. In addition to this, the legislation should clearly state that consent to take an image or to share an image of or with another person does not equate to consent for that person or another person to distribute the image.

(ii) Coverage

We agree that the defining qualities of revenge porn offences should include the following:

- The image was distributed *without a person's consent;*
- The image was used or misappropriated in a way that a reasonable person would understand to be a *violation of that person's privacy*; or
- The image was used or misappropriated in a way that a person would understand might *cause fear, apprehension, or mental harm to the victim*.

This coverage would further provide scope to include photo-shopped images, such as where a person's face has been imposed onto a sexually explicit image, which have the potential to cause significant harm and distress to victims. Not including this form of offending behaviour would create a loophole, and provide a powerful tool for perpetrators to harm, control and threaten victims in a way similar to if the photograph depicted the real image of the victim, without fear of legal redress.

(iii) Perpetrator intention and harm caused

Perpetrators may have diverse motivations for distributing intimate images, including those who distribute or threaten to distribute images out of spite or revenge against a current or former partner; those who threaten to distribute images in order to coerce, blackmail, humiliate or

embarrass another person; and those who distribute or threaten to distribute images for sexual gratification, fun, social notoriety and/or financial gain. Given the diversity of motives, we support legislation that takes into consideration both the mental element of the accused and proof of harm.

It is important that legislation clarifies the intent of the perpetrator, in addition to recognising the harm/distress caused to the victim(s), in order for the law to apply only in cases in which the perpetrator knows another person did not consent to the disclosure of an intimate or sexually explicit image. One challenge is whether the law should cover the actions of third parties who may not know whether the image was originally taken with the depicted person's consent for its distribution, and yet may deliberately or otherwise participate either in its continued circulation or in offensive comments and/or harassment directed at the victim.

Under Victorian law, it is an offence to maliciously distribute, or threaten to distribute, intimate images of another person without their consent. The word 'maliciously', although open to interpretation, can capture a broad range of motivations for the distribution of the image. For instance, it may potentially capture a person who distributes an image to a pornography website in order to make money, as well as someone who is trying to humiliate and embarrass another person. This language would then exclude third parties who distribute images without knowing the circumstances behind its creation – for instance, people who 'collect' revenge pornography images for fun or sexual gratification. Although that behaviour is abhorrent, *an offence should only apply if the person knows, or has reason to know, that the other person did not consent to the distribution of the image*. As US legal scholar Danielle Citron (2014, p. 150) claims, 'It [should] not be a crime, for instance, to repost a stranger's nude photos having no idea that person intended them to be kept private'.

Under South Australian legislation, the perpetrator must have known or have reason to believe that the other person 'does not consent to that particular distribution of the image' or 'does not consent to that particular distribution of the image and does not consent to distribution of the image generally' (s 26C). The South Australian law could capture third parties not involved in the original creation or distribution of the image, but only if they knowingly betray another person's privacy.

We also support new legislation that requires proof of harm. It should be made clear in the legislation that harm or distress can include emotional, reputational and financial distress and loss (with clear definitions of what constitutes harm and distress).

(iv) Threats to share intimate images

We support the creation of a specific offence in relation to revenge pornography threats regardless of whether the accused person has made threats specifically in relation to the subject of the image, or to another person (in line with s 41DB of the *Summary Offences Act 1966* (Vic)), and regardless of whether the image actually exists. Creating an offence to threaten to distribute an intimate image without consent means that the law will communicate the serious harms that result from such threats – for instance, perpetrators using threats in the context of an intimate relationship or in a post-separation context, or perpetrators using such images as a way to coerce a victim to engage in unwanted sex acts.

(v) Operating a revenge porn website

We support the introduction of a specific offence that criminalises individuals involved in the large-scale sharing and distribution of specific revenge pornography materials. The difficulties with this are that the website would need to be clearly defined as a revenge pornography site where the owners would reasonably be aware that the images are being posted without the consent of those depicted in them. Where the website is a revenge porn site, this would be a more straightforward process, but in situations where it may simply be a site depicting intimate and sexual images, it may be harder to prove intent to cause harm or distress. There are also complications around the transnational nature of technology-facilitated crimes, in that the owners of the site may not reside in Australia and thus not subject to its laws. In relation to Australian offenders, like other jurisdictions (Canada, US, New Zealand) a takedown notice could be issued requiring the site to remove the photos (although these usually operate under copyright breaches and place the onus on the victim to seek out such remedies). As such, we would support similar requirements being implemented in legislation that places the onus on the website owners to ensure consent and to remove any non-consensual images identified.

We further believe there should be legal requirements placed on websites to ascertain consent from the parties depicted before an intimate or sexual image is posted online. This could include a requirement that the person providing the website that hosts the image sign a legally binding document that says: (a) they own the image, and (b) they have the consent of the person or persons depicted to distribute the image. It would then be a criminal offence if these statements were found to be false. It would place some onus on Australian website operators to give forethought to the potential harms that may be caused, and it would place responsibility on the person distributing the image to the website. A takedown requirement should immediately be placed on the website owners should any images be found to be non-consensual.

4. A Note on Prevention

While specific federal legislation criminalising revenge pornography is overdue and constitutes an important measure to address these harms, ultimately we support a range of both legal and non-legal responses. The law should not be relied upon as the *only* mechanism for addressing these behaviours. Other measures should include those focused on corporate and organisational 'bystanders'; for example: government and community representatives working collaboratively with internet, website, social media and other service providers in order to promote service agreements and community codes of conduct that include clear statements regarding the unacceptability of revenge pornography; strategies for victims and other users to report content in violation and have it removed; and appropriate consequences for an individual's violation of such terms of service/codes of conduct.

We further recommend the development of information resources (such as a website and print materials) for victims of revenge pornography advising them of their legal and non-legal options. This might be delivered via existing victims of crime, legal aid, health and other information services, as well as through existing national hotlines (such as 1800 RESPECT, the Men's Referral Service and Kids Helpline). Staff responding to these hotlines should also be trained in legal and non-legal options so as to effectively respond to and advise victims of image-based sexual exploitation.

Finally, we suggest the development of prevention strategies such as through public education campaigns in traditional and digital media, workplace harassment and anti-discrimination resources, and school curriculum packages. Some of the harms of revenge pornography can be understood to result from the same *attitudinal support for violence against women*, that minimises violence, blames victims and excuses perpetrators (see VicHealth, 2014, National Community Attitudes Towards Violence Against Women Report). As such, prevention strategies could include content which: (a) identifies and challenges the gender and sexuality-based *social norms* and *cultural practices* that underlie the stigma that is directed at victims of technology-facilitated sexual violence and harassment; (b) redirects the responsibility onto the perpetrators of image-based sexual exploitation; and (c) encourages and provides tools for individuals to *take action as bystanders* and support a victim, report content for removal, and/or call-out victim blaming and shaming where they encounter image-based sexual exploitation of others. In short, by challenging the blame and stigma too often directed at victims of revenge pornography, and communicating a clear message of the responsibility of perpetrators and those who knowingly distribute these images, we can create the cultural change needed to support victims seeking redress, and ultimately, prevent these harms before they occur.

Conclusion

Australian law has not kept pace with evolving behaviours where technology is used in some way to perpetrate violence or harassment. While legal redress is not the only way to address revenge pornography, criminal legislation should be introduced at the federal level that specifically captures the harms related to the non-consensual distribution of intimate images. A formal legal response should be implemented in conjunction with a range of other legal and non-legal remedies and support services at educational, community, law enforcement, and policy levels. Lawmakers should ensure that such laws are broad enough to cover a range of different behaviours beyond the paradigmatic revenge pornography example (e.g. ex-lovers using sexually explicit images as a way to get revenge), but not so broad that they criminalise behaviours that lack specific, malicious intent and/or do not cause distress or harm.

Thank you for considering our submission.

Yours sincerely,

Dr Nicola Henry (La Trobe University)
Dr Asher Flynn (Monash University) and
Dr Anastasia Powell (RMIT University)

References

Australian Law Reform Commission (ALRC) (2014) *Serious Invasions of Privacy in the Digital Era,* Report 123.

Burns, A (2015) 'In Full View: Involuntary Porn and the Postfeminist Rhetoric of Choice', in C Nally and A Smith (eds) *Twenty–first Century Feminism: Forming and Performing Femininity.* Basingstoke: Palgrave Macmillan.

Citron, DK (2014) *Hate Crimes in Cyberspace*. Cambridge, Mass: Harvard University Press.

Citron, DK & Franks, MA (2014) 'Criminalizing Revenge Porn', *Wake Forest Law Review,* 49: 345–391.

Flynn, A, Kirchengast, T & Crofts, T (2015) 'Digital Technologies and Revenge Pornography', paper presented at *Cybercrime Studies Centre Seminar Series*, John Jay College, New York, United States, 12 November.

Franks, MA (2015) 'How to Defeat "Revenge Porn": First, Recognize It's About Privacy, Not Revenge', *Huffington Post,* 22 June

Henry, N & Powell, A (2015a) 'Beyond the "Sext": Technology–Facilitated Sexual Violence and Harassment Against Adult Women', *Australian and New Zealand Journal of Criminology,* 48(1): 104–118.

Henry, N & Powell, A (2015b) 'Embodied Harms: Gender, Shame and Technology–facilitated Sexual Violence in Cyberspace', *Violence Against Women,* 21(6): 758–779.

Henry, N & Powell, A (2016) 'Sexual Violence in the Digital Age: The Scope and Limits of Criminal Law', *Social & Legal Studies.* OnlineFirst.

McGlynn, C & Rackley, E (2015) 'The New Law Against "Revenge Porn" is Welcome, but No Guarantee of Success', *The Conversation,* 16 February: https://theconversation.com/the-new-law-against-revenge-porn-is-welcome-but-no-guarantee-of-success-37598

New South Wales Parliamentary Law and Justice Committee (2015) *Serious Invasions of Privacy Inquiry:* http://www.parliament.nsw.gov.au/prod/parlment/committee.nsf/0/53328E97515E48ECCA257E6F00292A7D

Powell, A & Henry N (2015) 'Digital Harassment and Abuse of Adult Australians: A Summary Report'. Melbourne: RMIT University.

Wilson, L (2016) 'Top Prosecutor Warns Australia's Revenge Porn Laws are too Weak to Properly Protect Women', *Courier Mail,* 10 January: http://www.couriermail.com.au/technology/top-prosecutor-warns-australias-revenge-porn-laws-are-too-weak-to-properly-protect-women/news-story/b597b7c0f1b0f76c7b7980ca545b512a

Legislation and Cases

Crimes Amendment (Sexual Offences and Other Matters) Act 2014 (Vic)
Criminal Code Act 1995 (Cth)
Criminal Code Amendment (Private Sexual Material) Bill 2015 (Cth)
Criminal Justice and Courts Act 2015 (UK)
R v Daniel McDonald and Dylan Deblaquiere [2013] ACTSC 122
Summary Offences (Filming Offences) Amendment Act 2013 (SA)
Summary Offences Act 1966 (Vic)