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# ORIGINAL ARTICLE

# A Critical Analysis of Ireland's Approaches to Addressing Cyber Sexual Violence

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> **Abstract** In this review article, I will critically analyse various approaches for addressing Cyber Sexual Violence (CSV) perpetrated against adults in the Republic of Ireland<sup>1</sup>. CSV is cyberspace-located, non-physical and in-direct, non-consensual or coerced acts of a sexualised nature. I examine two research questions: What approaches to addressing CSV perpetrated against adults exist in Ireland? What are the limitations of these approaches? Drawing on the literature, I will analyse Ireland's legal approach to addressing CSV, a CSV reporting tool, and CSV awareness-raising campaigns. Notably, recording, distributing, or publishing intimate images without consent is illegal in Ireland. However, Irish laws do not acknowledge this crime as sexual violence. Proving a perpetrator's intent to harm is central to sentencing rather than a focus on the harms experienced by the victim-survivor. Hotline.ie, the tool for the public to report illegal content online outside of the Garda Síochána<sup>2</sup>, has seen increased usage but features inconsistent messaging regarding CSV committed against adults. Also, there exists a gap in the support services available for adult victim-survivors of CSV who did not experience physical sexual violence. By analysing approaches to addressing CSV perpetrated against adults, this article supports future responses to CSV in Ireland to avoid and resolve the identified limitations.

**Key Words:** Cyber Sexual Violence, Online Violence, Irish Law, Hotline.ie, Awareness Campaigns

<sup>&</sup>lt;sup>1</sup> Hereafter identified as Ireland.

<sup>&</sup>lt;sup>2</sup> Garda Síochána, the Garda, is the national police force in Ireland.

## Introduction

In this review article, I critically analyse various approaches to addressing Cyber Sexual Violence (CSV) perpetrated against adults in Ireland. I answer two research questions: What approaches to addressing CSV perpetrated against adults exist in Ireland? What are the limitations of these approaches? Drawing on the literature, I share details of (1) Ireland's legal responses to CSV, (2) a CSV reporting tool, and (3) the CSV awareness-raising campaigns by Ireland's Government and Non-Governmental Organisations (NGOs).

I define CSV as non-physical, cyber-located, non-consensual or coerced acts of a sexualised nature. Contrastingly, traditional conceptualisations of sexual violence perceive it as direct and physical acts, resulting in physical injury (see Gillett 2018). CSV is a form of gendered violence and, when committed against women, an example of Violence Against Women (VAW) (The European Commission 2022; Gavey 2019; Harris and Woodlock 2021; Henry and Powell 2016). The European Commission's (2022) Directive on VAW and Domestic Violence (DV) explained that 'women...more frequently experience cyber violence based on their sex or gender, in particular, sexual forms of cyber violence' (p.2).

CSV sits on a continuum of technology-facilitated violence. It includes Image-Based Sexual Abuse (IBSA) (McGlynn *et al.* 2017). IBSA is colloquially called Revenge Pornography (McGlynn *et al.* 2017), and hereafter referred to as Image-Based Sexual Violence (IBSV) (Women's Aid in Ireland cited in McGlynn *et al.* 2017). IBSV 'encompasses all forms of the non-consensual creation and/or distribution of private sexual images...such as sexualised photoshopping, sexual extortion...upskirting, voyeurism and many other similar forms of sexualised abuse' (McGlynn *et al.* 2017, p.28). The images can be still in photographs and moving in sequence in videos. IBSV is *one aspect* of CSV, however CSV further includes cyber-located sexualised harassment, abuse and hate speech (Henry *et al.* 2017), also known as e-bile (Jane 2014; 2017).

## Context

Sexual violence is of notable concern worldwide. The World Health Organisation (2021) identified one in three women globally 'are subjected to physical or sexual violence by an intimate partner or sexual violence from a non-partner' (para.2). Victim-survivors made 1,104 disclosures of sexual abuse to Women's Aid in Ireland (n.d.) in 2021 (see also Vallières *et al.* 2022). Still, Ireland has a 'poor record' of responding to sexual violence (Scriver and Kennedy 2016, p.1). Scriver and Kennedy (2016) explained that this record is exacerbated by 'Ireland's historically conservative position on sexuality' (p.2). Gannon (2022) identified that sexual violence is widely underreported in Ireland, 'likely influenced by cultural attitudes', including social norms that 'contribute to rape-supportive cultures' (p.8). Guy (2006) explained that in rape-supportive cultures, 'rape happens because there are attitudes and norms that allow it to happen' (p.4). Ireland's rape-supportive culture, poor record of responding to sexual violence, and perpetuation of the norm that sexual violence is always physical, are of particular concern when exploring CSV. As CSV is cyber-located and non-physical, it already faces issues of tolerance and minimisation in society and is not perceived as constituting *actual* violence (Dunn 2021).

However, Ireland has recently taken steps to address CSV perpetrated against adults through laws, policies, and CSV awareness-raising campaigns. The Irish Government recently ratified the Online Safety and Media Regulation Act 2022 (OSMR 2022) and the Harassment, Harmful Communications and Related Offences Act 2020 (HHCRO 2020). Also, the Government's Third National Strategy on Domestic, Sexual, and Gender-based Violence (DSGV) outlines 'a statutory [DSGV] agency under the aegis of the Department of Justice' (Department of Justice 2022, p.8). Recent Irish laws and Governmental policies partially address non-consensual intimate image sharing (IBSV) and threatening or offensive online communications.

Furthermore, organisations supporting victim-survivors of sexual violence have campaigned over the past few years to raise awareness of technology-facilitated violence and its impacts. Women's Aid in Ireland (2022) released a widely circulated report, *It's Time to Talk About Porn*. They found that the 'majority' of 934 people surveyed in the report believed pornography 'is contributing [to] unrealistic sexual expectations...to coercion and [VAW] and girls, and to [IBSV]' (Women's Aid in Ireland 2022, p.2). The recognition that violent pornography may contribute to a culture of VAW is a radical feminist perspective, yet it is widely prevalent in Ireland, indicating a recognition of technology-facilitated violence and its impacts (Women's Aid in Ireland 2022).

## CSV In Ireland

No empirical qualitative studies on adults' experiences of CSV exist in Ireland. This lack of data means the nature of CSV, its impact, and how adults respond to CSV in Ireland is unknown. However, the European Union (EU) Fundamental Rights Agency (FRA) (2014) conducted a quantitative survey in 28 EU member states about online abuse and violence. The survey found '11 [percent] of women have received unwanted, offensive sexually explicit emails or SMS messages [and] inappropriate advances on social networking sites', and four percent of '18 to 29-year-old women...have experienced cyberstalking' (FRA 2014, p.28-29). The Economist Intelligence Unit (EIU) (2020) surveyed 4,500 women in countries with 'the largest online populations' (Rogers *et al.* 2022, p.2). EIU (2020) found that 85 percent of women worldwide 'reported witnessing online violence against other women'. Although Europe had the lowest regional percentage, 74 percent of women still reported witnessing this behaviour online (EIU 2020).

Additionally, two studies in Ireland on IBSV featured young people as participants (see Foody et al. 2021; McMahon 2021). Foody et al. (2021) researched consensual sexting (sexualised messaging) and the non-consensual sharing of intimate images with 848 students aged 15–18. They found that '44 [percent] of the participants had received an unwanted sexual image, and 29.5 [percent] reported that this happened frequently' (Foody et al. 2021, p.13). This finding is significant as it suggests that many young people in Ireland have received an unwanted sexualised image, which constitutes CSV (cyberflashing).

McMahon's (2021) study, conducted with 500 young people aged 18-25 in Ireland, found that 15 percent of females reported that a male partner had threatened 'to share sexually explicit/intimate photos/videos', and 17 percent had shared them without consent (p.12). In contrast to McMahon's (2021) findings, the 2016 European Quality of Life Survey found that in the 12 months preceding the survey, four percent of women and three percent of men in Ireland 'experienced online harassment' (Eurofound 2016, 'Life Online' tab). This difference in findings could relate to the terminology, the lifetime prevalence timeframe, and the COVID-

19 context resulting in greater Internet use reflected in McMahon's (2021) study. Nevertheless, while the extent of CSV among the adult population in Ireland is unknown, the Foody *et al.* (2021) and McMahon (2021) studies suggest that CSV behaviours are widespread among Ireland's young people.

Moreover, there have been several significant cases of IBSV in Ireland within the past ten years. Firstly, the non-consensual sharing of sexualised images of women and girls from the messaging platform Discord by over 500 Irish men (Pownall 2020). Secondly, the 2013 IBSV case of the so-called 'Slane Girl' (see Gannon 2022). Gannon (2022) undertook a discourse analysis of Tweets concerning the 'derogatorily dubbed' 17-year-old 'Slane Girl' who was non-consensually filmed giving oral sex (p.9). The girl, a victim-survivor of IBSV, was widely mocked and shamed online (Gannon 2022; Gye 2013). On the other hand, the men in the images, also IBSV victim-survivors, were called 'hero' and 'legend' (Gye 2013, para.3). Gannon (2022) found that 33 percent of Tweets 'contained an element of shaming the [girl]' (p.18). Just 15 percent referenced the men in the images, 'indicating a highly gendered attribution of responsibility for the incident' (Gannon 2022, p.18). Gannon's (2022) findings suggest that in Ireland, heterosexual scripts and victim-blaming attitudes toward CSV are prevalent.

# **Research Methodology and Methods**

# Literature Synthesis

I critically analyse various approaches in Ireland for addressing CSV perpetrated against adults synthesised from existing literature. I am a social science researcher undertaking doctoral research in Global Women's Studies. Hence, in this article, I analysed Irish laws, Hotline.ie, and awareness-raising campaigns in Ireland through a feminist social science lens.

## Data Collection and Analysis

I undertook keyword searches on databases Scopus, JSTOR and the University of Galway's online library system. I also searched Google for relevant media articles. CSV in Ireland is often discussed in media articles and reports from civil service organisations rather than academic journals. The keywords I searched for included: Ireland + image-based sexual abuse, cyber violence, cyber sexual violence, digital violence, online violence, revenge pornography, Hotline.ie, Online Safety and Media Regulation Act, and Harassment, Harmful Communications and Related Offences Act. In synthesising the literature, I grouped the approaches for addressing CSV perpetrated against adults into three categories: (1) Irish law, (2) a CSV reporting tool (in addition to the Garda), and (3) CSV awareness-raising campaigns.

## Limitations in the Research

Due to this paper's scope, I did not analyse *all* approaches in Ireland for addressing CSV perpetrated against adults. Instead, I include a breadth of key approaches. Future research should examine Irish laws in greater depth. In the next few years, case law relating to HHCRO (2020) and OSMR (2022) will set precedents for how the Irish legal system addresses CSV.

# **Findings and Discussion**

Below, I explore two research questions: What approaches to addressing CSV perpetrated against adults exist in Ireland? What are the limitations of these approaches? I share details of HHCRO (2020) and OSMR (2022), Hotine.ie, and CSV awareness-raising campaigns. Afterwards, I identify various limitations of these approaches, including HHCRO's summary offences, Hotline.ie's concern with IBSV perpetrated against children, and a lack of well-funded support services for victim-survivors of CSV.

# Approaches to Addressing CSV in Ireland

## The Law

In recent years, there has been significant legal progress in Ireland's commitment to addressing CSV, reflecting greater compliance with the United Nations (UN) Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) (Foley 2022). Jane (2018) identified that exposure to CSV 'is frequently framed [as]...a scenario too personal and idiosyncratic for law' (p.588). However, this framing is shifting in Ireland, with improvements in laws and policies beginning to address the intersections of violence and technology (see Foley 2022).

Since the ratification of HHCRO (2020), Irish law better protects people from CSV, and there has been an increase in the general public's awareness of IBSV. HHCRO (2020) transposes the EU's Audio-Visual Media Services Directive (AVMSD) into Irish law (Government of Ireland 2022). AVMSD requires the 'regulation of video-sharing platform services, such as YouTube, Facebook, and TikTok, under the regulatory framework for online safety' (Government of Ireland 2022, Appendix 7). By March 2023, the Garda commenced 72 prosecutions connected to 49 investigations under HHCRO (2020) (Garda 2023). These prosecutions suggest increased public awareness of CSV and recognition that it is illegal. It also implies a willingness to report CSV to the Garda and the knowledge of applying HHCRO (2020) to CSV investigations within the Garda.

HHCRO (2020) amends existing laws like the Domestic Violence Act 2018 (DVA). The DVA 2018 amendment means that if a CSV victim-survivor and perpetrator were in a relationship, their relationship is an aggravating factor in sentencing. When CSV occurs in DV, victim-survivors have improved access to legal protections. Notably for CSV, as it is non-physical, the DVA 2018 also introduced coercive control as an offence relating to psychological violence.

OSMR (2022) supports the Government in achieving its Third National Strategy on DSGV, specifically the commitment 'to make digital and media spaces safer by introducing robust regulation through legislation' (Government of Ireland 2022, p.24). The Department of Justice (2022)will increasingly focus on promoting 'public awareness of legislation...creating awareness of the harm caused by online abuse [and] pornography' (p.26). The Government's DSGV strategy acknowledges that CSV is on a continuum of DV in Ireland (Department of Justice 2022; see also Kelly 1998a; 1988b). HHCRO (2020) and OSMR (2022) are therefore important in addressing CSV and affirming the Government's commitment to eradicating all forms of VAW. The Government of Ireland (2022) expects these laws to help make 'the online world safe' for women and girls (Appendix 7).

OSMR (2022) established the Coimisiún na Meán<sup>3</sup>. The Coimisiún na Meán can 'address programme material, user-generated content, and other content, which are harmful or illegal' (OSMR 2022, p.20). OSMR (2022) identifies that platform providers must not broadcast or make available 'anything which may reasonably be regarded as causing harm or undue offence' (p.53). Platform providers are organisations or individuals in control of services (e.g., hardware/software) that 're-transmits or makes available...audio-visual media', such as Meta and its Facebook, Instagram, and WhatsApp platforms (OSMR 2022, p.74). Platform providers being held accountable for failing to remove harmful or offensive content in Ireland is an important step in addressing CSV. In the United Kingdom, holding platform providers to account for their role in harmful or offensive content distribution remains a point of contention in the Online Safety Bill (Collins 2023).

Additionally, OSMR (2022) advances the offence of flashing in the Criminal Law (Sexual Offences) Act 2017. OSMR (2022), characterises the offence of *cyber* flashing as 'online content by which a person exposes his or her genitals intending to cause fear, distress or alarm to another person' (p.107). Notably, cyberflashing is now legally punishable in Ireland. The advancement of Irish law in the OSMR (2022) and HHCRO (2020) Acts is a crucial step in the Government taking technology-facilitated violence, like CSV, seriously and demonstrating a commitment to addressing it.

## Reporting Tool

In Ireland, individuals can use Hotline.ie (n.d.) to report illegal content online. Hotline.ie (n.d.), established in 1999, responds to online safety concerns raised by the 'Government Working Group on the Illegal and Harmful Use of the Internet' (para.2 'About' tab). In collaboration with the Garda, Hotline.ie (n.d.) seeks to 'reduce the prevalence of illegal content online' (para.1 'Home' tab). Hotline.ie (n.d.) can be used to report online child abuse material, racism and xenophobia, financial scams and exploitation, and intimate image abuse that have originated in Ireland ('What to Report' tab).

Since the ratification of HHCRO (2020), media campaigns have increased the public's awareness of how to respond to CSV through Hotline.ie. Consequently, 2021 was 'the most onerous year in Hotline.ie's 22-years of operation' (Niculescu cited in Hotline.ie 2021, p.1). Hotline.ie offers information on where victim-survivors of CSV can access mental health support and legal advice. Theoretically, if someone reports CSV on Hotline.ie, members of the Internet Service Providers Association of Ireland must remove or disable access to the content. Removal usually occurs within three days. The increased usage of Hotline.ie suggests more awareness in Ireland of the existence of CSV, and knowledge of how to request its removal from the Internet.

## Awareness-Raising Campaigns

Recently there has been an increase in public knowledge of CSV perpetrated against adults, largely due to awareness-raising campaigns. Ireland's National Cyber Security Awareness Task Force (n.d.), launched in 2022, is a cross-sector partnership between technologists in cybersecurity, SAFE Ireland, and academics. The National Cyber Security Awareness Task

<sup>&</sup>lt;sup>3</sup> Media Commission.

Force (n.d.) aims to address technology-facilitated violence through an awareness-raising campaign, including national billboards, and resources for professionals working with victim-survivors.

Several other Government-backed media and education campaigns were launched to increase the public's awareness of their rights and legal developments regarding CSV in Ireland. The 2019 'No Excuses' sexual harassment and violence awareness campaign was 'high impact...to reach a national audience' (Department of Justice 2019, para.1). In 2022, the University of Galway (n.d.), in collaboration with the Government, launched the Consent Hub: 'The first-ever publicly available online national resource on consent awareness and learning in Ireland' (para.3). Recently, the Dublin Rape Crisis Centre (2023) launched a three-year awareness-raising campaign, *We-Consent*, after research revealed '70 [percent] of people think we have a problem with consent in Ireland' (para.5).

The National Council for Curriculum and Assessment produced teachers' Toolkits for educating students about 'how to interact safely and respectfully online, gender stereotypes, gender and sexual diversity, sexual consent and much more' (Government of Ireland 2022, p.20). While some of these awareness-raising campaigns in Ireland do not explicitly focus on CSV, the funding and promotion of campaigns concerning consent, sex, sexuality, sexual autonomy, and sexual expression are notable in achieving the cultural shift necessary to address CSV. They recognise the role of cross-sector collaboration and the use of the media and education in achieving the transition away from a rape-supportive culture (see Guy 2006).

# **Limitations in the Approaches for Addressing CSV**

## The Law

As Ireland is a common law system, how legislation is interpreted and applied by the courts and other organisations may differ from the initial intent of the law. Case law consists of 'a series of rules and principles developed by judges' (McMahon n.d., para.1). Over the next few years, case law will set legal precedents relating to HHCRO (2020) and OSMR (2022). Limited CSV case law already exists in Ireland, such as The People v P.K. (2020), which included the perpetrator recording physical rapes (Edwards 2020). However, a concern in case law development is the limited experience within the Garda and judiciary in applying new laws relating to online sexual violence due to the recent HHCRO (2020) and OSMR (2022) ratifications (Douglas *et al.* 2019; Rogers *et al.* 2022). Also, it is challenging for the Garda and judiciary to keep up with the technological innovations that facilitate CSV. Online violence is minimised as not occurring in the *real* world (Dunn 2021).

In 2018, a defence lawyer in Ireland successfully defended her client against the alleged rape of a 17-year-old girl. The lawyer told the jury, 'Look at the way she was dressed. She was wearing a thong with a lace front' (cited in BBC News 2018, para.1). This case led to worldwide protests and the '#ThisIsNotConsent' underwear-sharing campaign (Mezzofiore 2018). However, it demonstrates how the legal system in Ireland and elsewhere uphold the patriarchy and perpetuate rape myths and victim-blaming attitudes. Such misogynistic, sexist attitudes concerning the relevance of women's sexuality and sexual expression relating to their believability as victim-survivors of sexual violence are deeply concerning. This concern is exacerbated with CSV. After all, CSV may include the non-consensual distribution of initially consensually shared sexual images.

Furthermore, Women's Aid in Ireland (2021) highlighted that HHCRO (2020) features summary offences for some IBSV acts. With summary offences, 'proceedings must start within two years of the offence being committed' (Women's Aid in Ireland 2021, p.4; see also HHCRO 2020). This timeframe presents an issue for CSV victim-survivors who are initially unaware they have been targeted. Also, a summary conviction results in a 'fine or...imprisonment for a term not exceeding 12 months [or both]' (HHCRO 2020, p.4). Historically, a summary offence was a *petty* offence (Citizens Information n.d.a). In contrast, rape is the second most serious crime in Irish law after murder. Considering the recording, distribution or publishing of intimate images without consent as a summary offence minimises the harm victim-survivors experience. It places IBSV in a hierarchy of harm compared to other acts of sexual violence (Kelly 1988a; 1988b). This hierarchy sends a worrying message to society; some sexual violence is *less serious* and *less punishable* in Ireland.

Henry *et al.* (2020) identified that legal responses to CSV often require the prosecution to prove that the perpetrator intended to cause harm. This requirement is also true for HHCRO (2020). HHCRO (2020) states, 'a person intends to cause harm where he or she...intentionally seriously interferes with the other person's peace and privacy or causes alarm or distress to the other person' (p.5). HHCRO (2020) centres on a perpetrator's intent to *seriously interfere* with another individual. As Bowie (n.d.) explained, 'the fact that the recording [and/or] distribution of the image [were] non-consensual should suffice' in the offence being considered serious and harmful (p.145). A more nuanced approach to harm in Irish law would better address CSV and offer victim-survivors greater legal recourse.

Additionally, Bowie (n.d.) argued that to 'effectuate a broader legal and policy response to [VAW]', Irish law needs to articulate that IBSV is *sexual violence* (p.143). HHCRO (2020) does not state that the non-consensual creation and/or distribution of intimate images is sexual abuse or violence. It refers to psychological harm but fails to recognise the embodied nature of CSV harms (Powell and Henry 2017). This failure is surprising since HHCRO (2020) is known as Coco's Law in honour of Nicole 'Coco' Fox who died by suicide after experiencing an online hate campaign, including CSV (see Murray 2022). As McGlynn and Rackley (2017) identified, 'terminology matters...it informs and shapes our response' to CSV (p.43). I concur with O'Beirne (2022) that 'the categorisation of [IBSV] into a harmful communications [Act] instead of legislation that deals primarily with sexual violence minimises [victim-survivors'] experiences' (para.8). The possibility of a summary conviction for IBSV and the failure to acknowledge it as sexual violence in Irish law concerningly implies IBSV is less harmful than physical sexual violence.

## Reporting Tool

Historically, Hotline.ie was concerned with CSV perpetrated against children, not adults. On Hotline.ie (n.d.), it states that members of the Internet Service Providers Association of Ireland must comply with requests 'for the removal of child sexual abuse and child sexual exploitation from the Internet' (para.1 'Our Members' tab). Hotline.ie (n.d.) also states that 'the removal of child sexual abuse images and videos from the Internet is the **core of our work** [emphasis in original]' (para.1 'About' tab). In April 2023, this declaration and instruction to Service Providers are still live on Hotline.ie. They send a mixed message concerning whether Service Providers must comply with requests for removing CSV perpetrated against adults. Although, the existence of OSMR (2022) may now negate this issue.

Still, the messaging on Hotline.ie could discourage CSV adult victim-survivors from using the tool. As an approach for addressing CSV in Ireland, Hotline.ie can only be used when the content requiring removal originated in Ireland, offering little support for those living in Ireland whose CSV experience crosses national borders. Plus, Hotline.ie does little to address the stigma and shame of experiencing CSV. As Saidléar (2023) identified, the 'takedown [of content] capacity is only a tiny segment of the problem' (para.9). One of the challenges in addressing CSV is that once content exists online, it is difficult to remove entirely; CSV content can be reused to continue victimisation.

# Awareness-Raising Campaigns

While Ireland's National Cyber Security Awareness Task Force highlighted the existence and impact of technology-facilitated violence, there is a lack of well-funded services to support CSV victim-survivors. With physical sexual violence, victim-survivors can access support services from Rape Crisis Centres by attending a Sexual Assault Treatment Unit (SATU). However, attending a SATU may not be suitable for a victim-survivor of CSV. The SATU offers medicalised support for gathering forensic evidence and testing for sexually transmitted diseases, which is not as applicable for CSV victim-survivors (see Galway RCC n.d.).

# Societal Problem with Widespread Impacts

Although it is not within the scope of this article to explore in-depth, I understand CSV to be a societal problem with widespread impacts (Eikren and Ingram-Waters 2016). The limitations in existing approaches in Ireland for addressing CSV perpetrated against adults reflects 'a culture in which sexual violence is less likely to be recognised, investigated or prosecuted' (McGlynn and Rackley 2016, p.2). Hence, approaches to addressing CSV in Ireland must account for 'historical unequal power relations' between women and men (Department for Justice 2022, p.47). Effective approaches require cross-sector collaboration to support a shift in attitudes that normalise and minimise CSV. However, cross-sector collaboration in addressing CSV is underdeveloped in Ireland, partially because of austerity measures and funding restrictions on organisations supporting victim-survivors of sexual violence (see Foley 2022).

## **Conclusion**

This review article critically analysed several approaches to addressing CSV perpetrated against adults in Ireland. Ireland's commitment to addressing CSV and protecting individuals online through laws has improved in recent years. The OSMR (2022) established the Coimisiún na Meán to oversee platform providers' compliance in removing harmful online content. HHCRO (2020) is understood to address IBSV. Since its ratification in 2021, the Garda has commenced 72 prosecutions under HHCRO (2020). Hotline.ie offers a tool to the public to report illegal content online. In 2021, Hotline.ie had the most productive year in its history, but still places the responsibility on the victim-survivor of CSV to report being targeted. HHCRO (2020) focuses on the perpetrator's intent to harm, not the victim-survivors' experience of harm, and does not define the non-consensual sharing of intimate images as *sexual violence*. There is also a lack of well-funded support services in Ireland for victim-survivors of CSV. By critically analysing several approaches in Ireland to addressing CSV perpetrated against adults,

this article supports future responses to CSV to avoid and resolve the identified limitations. I highlight the importance of cross-sector collaboration in addressing CSV, as successfully employed in the National Cyber Security Awareness Task Force. CSV is an interdisciplinary societal concern requiring a considered cross-sector response.

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