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# **CYBER VIOLENCE AGAINST WOMEN IN INDIA: EMERGING CHALLENGES UNDER THE BHARATIYA NYAYA SANHITA 2023**

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## **ABSTRACT**

The rapid expansion of digital technologies and internet connectivity has transformed social interaction, communication, education, commerce and governance in India. While technological advancement has created numerous opportunities for social and economic development, it has also facilitated new forms of violence and abuse against women in cyberspace. Cyber violence against women includes online harassment, cyber stalking, identity theft, image-based sexual abuse, revenge pornography, cyber bullying, deep fake content, online defamation and other forms of technology-enabled gender-based violence. Such acts not only violate the privacy and dignity of women but also affect their mental health, personal security, freedom of expression and participation in digital spaces. The enactment of the Bharatiya Nyaya Sanhita 2023 marks a significant reform in India's criminal justice framework by replacing several provisions of the Indian Penal Code, 1860. However, the increasing sophistication of cybercrimes presents new legal and enforcement challenges. Although various provisions of the Bharatiya Nyaya Sanhita 2023, the Information Technology Act 2000 and related laws provide legal remedies against cyber offences, concerns remain regarding the adequacy of these provisions in addressing emerging forms of digital abuse directed against women.

This paper adopts a socio-legal approach to examine the nature, causes and consequences of cyber violence against women in India in the context of the Bharatiya Nyaya Sanhita 2023. The study analyses existing legal provisions, judicial developments, enforcement challenges and emerging technological threats such as artificial intelligence-generated deep fakes and online sexual exploitation. The paper argues that legal reforms alone cannot effectively combat cyber violence unless supported by stronger institutional mechanisms, technological safeguards, digital literacy, victim support systems and gender-sensitive law enforcement practices. The study concludes that a comprehensive and rights-based approach is necessary to ensure women's safety, dignity and equal participation in the digital environment.

**Keywords:** Cyber Violence, Women's Rights, Bharatiya Nyaya Sanhita 2023, Cybercrime, Digital Safety.

### **Introduction:**

The digital revolution has significantly transformed modern society by expanding access to information, communication, education, financial services and social interaction. India has witnessed remarkable growth in internet penetration, Smartphone usage, social media engagement and digital governance initiatives over the last decade. Government programmes promoting digital inclusion and technological innovation have enabled millions of citizens to participate in the digital economy. Women have increasingly become active users of digital platforms for education, employment, entrepreneurship, political participation and social networking. However, alongside these positive developments, the digital environment has also become a space where various forms of violence and exploitation against women continue to emerge.

Cyber violence against women has become one of the most serious challenges confronting contemporary society. Unlike traditional forms of violence, cyber violence is committed through digital technologies such as social media platforms, messaging applications, websites, online forums and artificial intelligence-based systems. These offences include cyber stalking, online harassment, cyber bullying, identity theft, unauthorized sharing of intimate images, revenge pornography, morphing of photographs, online threats, doxing, deep fake pornography and various other forms of technology-facilitated abuse. Such acts often cause severe psychological, emotional, social and economic harm to victims. In many cases, women experience fear, humiliation, anxiety, reputational damage and restrictions on their participation in digital spaces.

The growing use of artificial intelligence and advanced digital technologies has further complicated the problem. Deep fake technology now allows the creation of highly realistic but fabricated images, videos and audio recordings that can be used to target women. The misuse of such technologies has created new challenges for privacy protection, personal dignity and cyber security. Women journalists, political leaders, social activists, professionals, students and public figures are increasingly vulnerable to digital attacks aimed at silencing their voices or damaging their reputation. The anonymity provided by the internet often encourages offenders to engage in abusive conduct with limited fear of immediate consequences.

Cyber violence against women is not merely a technological issue but also a human rights concern. It affects fundamental rights including the right to life, dignity, privacy, equality, freedom of expression and access to justice. The Supreme Court of India has consistently emphasized that dignity and privacy form an essential part of the constitutional guarantee under Article 21 of the Constitution of India. When women are subjected to online harassment, sexual exploitation or identity-based attacks, these constitutional values are directly threatened. Therefore, ensuring digital safety has become an important aspect of protecting women's rights in the modern era.

Recognizing the need for criminal law reform, India enacted the Bharatiya Nyaya Sanhita, 2023, which replaced the Indian Penal Code 1860. The new legislation seeks to modernize criminal law and respond to contemporary forms of criminal conduct. Several provisions relating to sexual offences, criminal intimidation, harassment, privacy violations and offences against women have relevance in addressing cyber violence. However, the rapidly changing nature of technology continues to present challenges for effective implementation and enforcement. The interaction between the Bharatiya Nyaya Sanhita 2023 and the Information Technology Act 2000 raises important questions regarding jurisdiction, investigation, digital evidence, intermediary responsibility and victim protection.

Despite the existence of legal provisions, cyber violence remains significantly underreported. Many victims hesitate to approach law enforcement agencies due to fear of social stigma, lack of awareness, concerns regarding privacy and limited confidence in the justice system. Investigative difficulties, technological complexities, cross-border offences and delays in legal proceedings further hinder effective enforcement. These challenges demonstrate the need for a comprehensive legal and policy framework capable of addressing both traditional cyber offences and emerging technological threats.

Against this background, the present study examines the phenomenon of cyber violence against women in India with special reference to the Bharatiya Nyaya Sanhita 2023. The paper explores the evolving nature of cyber violence analyses relevant legal provisions, evaluates enforcement challenges and assesses the adequacy of existing mechanisms for protecting women in digital spaces. The study further highlights the need for stronger legal safeguards, institutional reforms, digital literacy initiatives and gender-sensitive cyber governance to ensure that technological progress does not compromise the safety, dignity and constitutional rights of

women.

### **Concept and Forms of Cyber Violence against Women:**

Cyber violence against women refers to acts of harassment, abuse, intimidation, exploitation or discrimination committed against women through digital technologies and online platforms. It is a form of gender-based violence that occurs in cyberspace and uses information and communication technologies as a means of causing harm. With the rapid growth of social media, online communication platforms and digital services, women have gained greater opportunities for education, employment and public participation. However, these developments have also increased their exposure to various forms of online abuse and victimization.

Cyber violence differs from traditional forms of violence because it can occur anonymously, spread rapidly across digital networks and reach victims regardless of geographical boundaries. The impact of such violence often extends beyond the online environment and affects the personal, social, professional and psychological well-being of victims. Women who experience cyber abuse frequently suffer emotional distress, fear, anxiety, reputational damage and social isolation. In some cases, cyber violence may also lead to physical threats and offline harassment.

Cyber violence against women takes several forms. One of the most common forms is cyber stalking where an offender repeatedly monitors, contacts or threatens a woman through digital platforms. Online harassment is another widespread problem and includes abusive messages, offensive comments, threats and intimidation. Cyber bullying involves the repeated use of digital communication to humiliate, insult or target an individual. Identity theft and impersonation occur when personal information, photographs or social media accounts are used without permission to deceive others or damage a person's reputation.

A particularly serious form of cyber violence is image-based sexual abuse. This includes the unauthorized sharing of intimate photographs or videos, revenge pornography and the creation of manipulated or morphed images. Recent technological developments have also led to the rise of deep fake content, where artificial intelligence is used to create realistic but false images, videos or audio recordings depicting women in compromising situations. Such practices can severely affect a victim's dignity, privacy and social standing.

The increasing diversity of cyber offences demonstrates that cyber violence against women is not merely a technological issue but a significant legal and social challenge. Effective legal protection, technological safeguards and public awareness are essential to ensure that women can participate safely and equally in the digital environment.

### **Cyber Violence and Human Rights of Women in Digital Spaces:**

Cyber violence against women has emerged as a serious threat to the protection of human rights in the digital age. The internet and digital technologies have become important platforms for communication, education, employment, political participation and social interaction. However, when women are subjected to online harassment, cyber stalking identity theft, deep fake abuse or other forms of digital violence, their fundamental rights are directly affected. Therefore, cyber violence should be viewed not only as a criminal law issue but also as a human rights concern.

One of the most important rights affected by cyber violence is the right to dignity. Human dignity is recognized as a foundational value in international human rights law and the Constitution of India. Online abuse, sexual harassment and defamatory content can seriously damage a woman's reputation and self-respect. Deep fake videos and non-consensual sharing of intimate images often expose victims to humiliation and social stigma, thereby undermining their dignity and personal autonomy.

The right to privacy is also significantly affected. Women increasingly share personal information and engage in social activities through digital platforms. Unauthorized access to personal data, online surveillance, hacking of accounts and misuse of photographs or videos violate privacy rights and create feelings of insecurity. The Supreme Court of India has recognized privacy as a fundamental right under Article 21 of the Constitution, making protection against digital intrusion an essential legal obligation.

Cyber violence may also restrict freedom of expression and participation in public life. Many women reduce their online presence or withdraw from digital platforms after experiencing harassment or threats. This limits their ability to express opinions, engage in public discussions and participate in democratic processes. Journalists, activists, academics and women leaders are often targeted through coordinated online attacks intended to silence their voices.

The principle of equality is equally relevant. Women and girls frequently face gender-specific forms of online abuse that are not experienced to the same extent by men. Such discrimination creates barriers to equal participation in digital spaces and reinforces existing social inequalities. Vulnerable groups including women from marginalized communities may face multiple forms of discrimination and abuse.

Protecting human rights in the digital environment requires effective legal remedies, strong cyber security measures, victim support mechanisms, and greater digital literacy. Ensuring women's safety online is essential for achieving equality, dignity, freedom and justice in an increasingly digital society.

### **Legal Framework Governing Cyber Violence against Women in India: Information Technology Act 2000 and Bharatiya Nyaya Sanhita 2023:**

India has developed a legal framework to address cyber offences through a combination of criminal law and information technology legislation. The primary laws governing cyber violence against women are the Information Technology Act 2000 and the Bharatiya Nyaya Sanhita 2023. Together, these laws seek to protect women from online abuse, privacy violations, cyber stalking identity theft and other forms of digital victimization.

The Information Technology Act 2000 was enacted to regulate electronic communication and provide legal recognition to digital transactions. Over time, it has become an important tool for addressing cybercrimes. Several provisions of the Act are relevant to offences against women. The Act penalizes unauthorized access to computer systems, identity theft, cheating by personation through electronic means, and violations of privacy. It also provides legal remedies against the publication or transmission of obscene and sexually explicit content in electronic form. These provisions are frequently invoked in cases involving online harassment, revenge pornography, cyber stalking and the unauthorized sharing of intimate images.

The Bharatiya Nyaya Sanhita, 2023 has replaced the Indian Penal Code, 1860 and forms the foundation of criminal law in India. Although the legislation does not contain a separate chapter exclusively dealing with cyber violence against women, many of its provisions apply to offences committed through digital platforms. Acts such as criminal intimidation, stalking, sexual harassment, voyeurism, defamation, extortion and threats can now occur through social media platforms, messaging applications, emails and other digital technologies. The Bharatiya

Nyaya Sanhita recognizes the seriousness of offences affecting the dignity and safety of women and provides punishment for conduct that may be committed both offline and online.

As well to statutory provisions, intermediary regulations issued under the Information Technology framework impose obligations upon social media platforms and digital service providers. These regulations require intermediaries to remove unlawful content, cooperate with law enforcement agencies and establish grievance redressal mechanisms. Such measures are intended to reduce the spread of harmful content and provide quicker remedies for victims.

Despite these legal protections, enforcement remains a significant challenge. Cyber offences often involve anonymous offenders, digital evidence and cross-border activities that complicate investigations. Therefore, effective implementation of the law requires specialized cybercrime units, technological expertise, victim support mechanisms and greater coordination among regulatory authorities. A strong legal framework combined with effective enforcement is essential to ensure the safety and dignity of women in digital spaces.

### **Emerging Challenges under the Bharatiya Nyaya Sanhita 2023:**

Although the Bharatiya Nyaya Sanhita, 2023 represents an important reform in India's criminal justice system, several challenges continue to arise in addressing cyber violence against women. The rapid development of digital technologies has created new forms of online abuse that often evolve faster than legal responses. As a result, the practical application of criminal law in cyberspace remains complex and challenging.

One major concern is the growing use of artificial intelligence and deep fake technology. Deep fakes can create highly realistic images, videos and audio recordings that falsely portray women in compromising situations. Such content can cause serious reputational harm and emotional distress. While existing criminal provisions relating to harassment, defamation, privacy violations and obscenity may apply, there is still uncertainty regarding the specific treatment of AI-generated content under existing legal frameworks. Another challenge relates to the identification of offenders. Cybercriminals frequently use anonymous accounts, encrypted communication channels and foreign-based digital platforms to conceal their identities. This makes investigation and prosecution difficult. In many cases, law enforcement agencies face obstacles in obtaining digital evidence and securing cooperation from service providers located outside India.

Jurisdictional issues also create difficulties. Cyber offences often cross state and national boundaries, making it challenging to determine which authority has jurisdiction over a particular case. The global nature of the internet requires greater international cooperation and improved mechanisms for cross-border investigation and evidence collection.

Victim reporting remains another significant concern. Many women do not report cyber violence due to fear of social stigma, concerns regarding privacy, lack of awareness or limited confidence in legal remedies. Underreporting reduces the effectiveness of legal enforcement and allows offenders to continue harmful activities without accountability.

The Bharatiya Nyaya Sanhita 2023 provides a stronger criminal law framework, but legal reform alone cannot eliminate cyber violence. Effective protection requires specialized cybercrime investigation units, digital forensic expertise, public awareness programmes, gender-sensitive policing and accessible support services for victims. Continuous review of laws and policies is also necessary to ensure that legal frameworks remain capable of addressing emerging technological threats. Only through a comprehensive approach can the objectives of safety, dignity, and justice for women in digital spaces be fully achieved.

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### **Judicial Responses and Landmark Decisions on Cyber Violence against Women:**

The Indian judiciary has played an important role in protecting the rights of women in the digital environment. Although cyber violence is a relatively recent phenomenon, courts have consistently interpreted constitutional rights and statutory provisions in a manner that safeguards the dignity, privacy and security of women. Judicial decisions have emphasized that fundamental rights guaranteed under the Constitution of India must remain protected even in cyberspace.

One of the most significant developments in this area is the recognition of the right to privacy as a fundamental right by the Supreme Court in *Justice K.S. Puttaswamy v. Union of India 2017*. The Court held that privacy is an integral part of the right to life and personal liberty under Article 21 of the Constitution. This judgment has considerable relevance in cases involving cyber stalking unauthorized sharing of personal information, identity theft and non-consensual circulation of intimate content. It provides a constitutional basis for protecting

individuals against digital intrusions and privacy violations. An additional important decision is *Shreya Singhal v. Union of India 2015* where the Supreme Court struck down Section 66A of the Information Technology Act 2000 on the ground that it violated freedom of speech and expression. While the judgment protected constitutional freedoms, it also highlighted the need for balanced regulation that addresses online abuse without restricting legitimate expression. The decision continues to influence discussions on cyber regulation and online accountability.

Indian courts have also adopted a strict approach in cases involving obscene content, online harassment and misuse of digital platforms. Various High Courts have directed authorities to remove objectionable content, protect victims from online abuse and ensure effective investigation of cyber offences. Courts have increasingly recognized the harmful effects of revenge pornography, image morphing and cyber stalking and deep fake-related abuses against women.

Judicial intervention has further strengthened the responsibility of investigative agencies and digital intermediaries in addressing cybercrime. Courts have emphasized the need for prompt action, preservation of electronic evidence and victim-sensitive approaches during investigations. Through these decisions, the judiciary has contributed significantly to the development of legal principles that protect women from emerging forms of cyber violence. Still, continuous judicial engagement remains necessary as technology evolves and new forms of online abuse continue to emerge.

### **Role of Law Enforcement Agencies and Digital Platforms in Preventing Cyber Violence:**

The effective prevention of cyber violence against women requires active cooperation between law enforcement agencies, digital platforms, regulatory authorities and civil society organizations. Legal provisions alone cannot adequately address online abuse unless supported by efficient enforcement mechanisms and responsible technological governance. As cyber offences become increasingly sophisticated, the role of institutions responsible for prevention and enforcement has become more important than ever.

Law enforcement agencies are the primary authorities responsible for investigating cyber offences and ensuring justice for victims. Specialized cybercrime cells have been established in several states to deal with offences involving online harassment, cyber stalking identity theft, financial fraud and digital exploitation. These agencies are responsible for collecting electronic

evidence, identifying offenders, tracing digital activities and coordinating with service providers during investigations. The establishment of the National Cyber Crime Reporting Portal has also improved access to reporting mechanisms for victims of cyber offences. However, challenges such as limited technical expertise, shortage of trained personnel, jurisdictional complexities and delays in investigation continue to affect the effectiveness of enforcement efforts.

Digital platforms also have a significant responsibility in preventing cyber violence. Social media companies, messaging services, content-sharing platforms and online intermediaries provide the technological infrastructure through which most cyber offences occur. These platforms are expected to establish effective content moderation systems, grievance redressal mechanisms and reporting tools that allow users to report abusive or harmful content. They are also required to cooperate with law enforcement agencies and comply with legal obligations relating to the removal of unlawful material.

Technological measures such as artificial intelligence-based content detection, identity verification systems, privacy controls and automated reporting mechanisms can help reduce the spread of harmful content. At the same time, platforms must balance safety concerns with the protection of freedom of expression and user rights.

Public awareness and digital literacy programmes are equally important in preventing cyber violence. Women should be informed about online safety practices, privacy settings, reporting procedures and available legal remedies. Educational institutions, government agencies and civil society organizations can play a vital role in promoting responsible digital behaviour and creating awareness about cybercrime. A coordinated approach involving law enforcement agencies, digital platforms, policymakers and citizens is essential for building a safer digital environment. Such cooperation can strengthen accountability, improve victim protection and reduce the growing threat of cyber violence against women in India.

### **Recommendations for Strengthening Legal Protection against Cyber Violence under the Bharatiya Nyaya Sanhita 2023:**

The increasing incidence of cyber violence against women requires a comprehensive and proactive legal response. Although the Bharatiya Nyaya Sanhita 2023 and the Information Technology Act 2000 provide important legal protections, several reforms are necessary to

address emerging technological threats effectively. Strengthening legal safeguards is essential for ensuring the safety, dignity and equality of women in digital spaces.

One important recommendation is the introduction of specific legal provisions dealing with cyber violence against women. The growing misuse of artificial intelligence, deep fake technology, online impersonation and image-based sexual abuse requires clear statutory recognition. Explicit provisions would reduce legal ambiguity and assist law enforcement agencies in the effective investigation and prosecution of offenders. There is also a need to improve the capacity of law enforcement agencies. Specialized cybercrime units should be strengthened through advanced training in digital forensics, cyber investigation techniques and the collection of electronic evidence. Police officers, prosecutors and judicial officers should receive regular training on emerging cyber offences and gender-sensitive approaches to victim protection.

Victim support mechanisms should be expanded. Women affected by cyber violence often experience psychological trauma, social stigma and reputational harm. Governments should establish dedicated support centers that provide legal assistance, counseling services and digital safety guidance. Fast-track procedures for removing harmful online content can also reduce the damage suffered by victims.

Digital platforms must assume greater responsibility for preventing online abuse. Social media companies should adopt effective content moderation systems, establish user-friendly complaint mechanisms and cooperate promptly with law enforcement agencies. Advanced technologies should be used to identify and remove harmful content including deep fakes, cyber harassment and non-consensual intimate material.

Public awareness and digital literacy programmes are equally important. Citizens should be educated about online safety, privacy protection, cybercrime reporting procedures and responsible use of digital technologies. Educational institutions can play a significant role in promoting cyber ethics and digital responsibility among young users. Finally, international cooperation should be strengthened because many cyber offences involve cross-border activities. Effective collaboration between governments, technology companies and international organizations is necessary to combat cybercrime and ensure accountability. Through these measures, India can develop a stronger and more responsive framework for protecting women against cyber violence in the digital age.

**Conclusion:**

Cyber violence against women has emerged as one of the most significant challenges confronting modern society in the digital age. The rapid expansion of internet access, social media platforms, artificial intelligence technologies and digital communication tools has transformed the way people interact and share information. While these technological developments have created new opportunities for education, employment, entrepreneurship and social participation, they have also facilitated new forms of harassment, exploitation and abuse directed against women.

This study demonstrates that cyber violence is not merely a technological issue but a serious violation of human rights. Cyber stalking online harassment, identity theft, deep fake content, image-based sexual abuse, cyber bullying and privacy violations directly affect the dignity, security, equality and autonomy of women. Such offences often cause emotional distress, reputational damage, psychological trauma and social exclusion. The growing sophistication of artificial intelligence and digital technologies has further increased the complexity of these challenges.

The enactment of the Bharatiya Nyaya Sanhita, 2023 represents an important step in the modernization of India's criminal justice framework. Together with the Information Technology Act 2000, it provides legal mechanisms for addressing various forms of cybercrime and offences affecting women. However, the study reveals that existing legal provisions are not always sufficient to address emerging threats such as deep fakes, AI-generated abuse and technologically advanced forms of digital exploitation. Legal enforcement also faces challenges relating to anonymity, jurisdiction, digital evidence, and underreporting of offences.

Judicial decisions have played a valuable role in protecting privacy, dignity and freedom in digital spaces. At the same time, law enforcement agencies, digital platforms, policymakers and civil society organizations share responsibility for creating a safer online environment. Stronger regulation, improved cybercrime investigation capabilities, victim support mechanisms, digital literacy programmes and responsible platform governance are essential for effective protection.

In brief, the fight against cyber violence requires a balanced approach that combines legal

reform, technological safeguards, institutional accountability and public awareness. Protecting women in digital spaces is essential for ensuring equality, justice and human dignity in contemporary society. As technology continues to evolve, India must adopt a rights-based and gender-sensitive approach to cyber governance so that digital progress contributes to empowerment rather than exploitation. Only through such collective efforts can a secure and inclusive digital environment be created for present and future generations.

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