A Criminal Perspective on Revenge Pornography: Comparative Legal Gaps and Public Perceptions in Malaysia and Indonesia

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Abstract
Revenge pornography is the non-consensual distribution of digital intimate images (NCII). It is a modern form of extortion and sexual abuse, complicated by the fact that some photos may have been willingly shared. However, consent was never given for their distribution, or there is fear that they may be distributed. While the United Kingdom has introduced specific laws criminalising revenge porn, Malaysia and Indonesia still rely on broad statutes that do not fully address its complexities. This study uses a mixed-method approach, including doctrinal analysis of Malaysian and Indonesian legal frameworks and empirical data from a survey of 201 Malaysian respondents and an expert interview. Digital criminal law is expanding, but legislation and policy have not kept pace with the complexity of these crimes, leaving a unclear focus for enforcement and legal reform. This article contributes by combining legal and empirical analysis to examine the doctrinal, cultural, and enforcement gaps surrounding revenge pornography in Malaysia and Indonesia, proposing targeted legislative and regional reforms. The survey results show that although 56.7% of respondents have heard of revenge pornography, significant misconceptions about consent still exist, with 10% believing that sharing intimate images with a partner implies consent for public sharing. Female respondents report higher victimisation rates, while male respondents are more likely to view leaked images. In Indonesia, the Pornography Act 2008 and the Information and Electronic Transactions Law 2016 prohibit distributing obscene material. Yet, enforcement remains weak and often undermined by patriarchal norms. Some Malaysians are aware of revenge porn, but protections are still lacking. A comparative analysis reveals that Malaysia rejects the idea of implied consent in public discussion, but this view is not reflected in its laws. Indonesia has relevant legislation but offers weak institutional protections for victims. There is an urgent need for dedicated laws, stronger victim-centered remedies, and regional

cooperation. Only through these reforms can revenge pornography be addressed as a transnational digital harm, ensuring better justice and protection for victims.

Keywords: Revenge Pornography, Non-Consensual Intimate Images, Malaysia, Indonesia, Cybercrime

Introduction

The proliferation of digital technologies has enabled new forms of interpersonal abuse, among them the phenomenon of revenge pornography, commonly described as the non-consensual distribution of intimate images. It involves the unauthorised dissemination of sexually explicit images or videos, often originally created in private contexts, and frequently motivated by revenge, coercion, or humiliation. Victims endure significant psychological harm, reputational damage, and social ostracism. The digital permanence of such content amplifies the injury, as leaked images may be endlessly reproduced and circulated across global platforms.

While the issue has received legislative recognition in several advanced jurisdictions, many countries in Southeast Asia continue to lag. Section 33 of the UK Criminal Justice and Courts Act 2015, which previously criminalised the disclosure of private sexual images with intent to cause distress, was later replaced by Section 66B of the Sexual Offences Act 2003, inserted through Section 188 of the Online Safety Act 2023. This framework provides clear statutory definitions, prohibitions, and remedies.

In contrast, Malaysia and Indonesia have yet to adopt comprehensive measures. Malaysia relies on Penal Code provisions such as Section 354 (outraging modesty) and Section 509 (insulting the modesty of a person), together with Section 233 of the Communications and Multimedia Act 1998, to prosecute cases indirectly related to non-consensual distribution of images. Amendment to the Penal Code in 2025 addressing doxxing and modernised the Penal Code to recognise certain forms of cyber harassment. But revenge pornography itself remains legally undefined. Similarly, the Malaysian Online Safety Act 2025 focuses on platform responsibility in making social media companies and digital service providers take proactive steps to prevent harm and protect users. It is an industry responsibility and not a user-level criminal law like the UK's Section 66B. Victims must rely on outdated or indirect legal avenues that fail to capture the essence of the offence.

Indonesia provides another perspective. The Pornography Act 2008 and the Information and Electronic Transactions Law 2016 prohibit the distribution of obscene material and online exploitation. However, Indonesian scholars consistently highlight the inadequacies of enforcement, pointing to patriarchal norms, cultural reluctance to prosecute sexual offences, and institutional failures that leave victims unprotected.

This study sets out to examine revenge pornography from a comparative Southeast Asian perspective, using Malaysia and Indonesia as case studies. The Malaysian analysis is enriched by original empirical research in the form of a structured survey and expert interview, while the Indonesian component is examined doctrinally through statutory analysis and scholarly critique. Together, these approaches provide insight into the region's legal gaps, social perceptions, and policy challenges.

The central argument advanced here is that both Malaysia and Indonesia require legal reforms that move beyond general obscenity or modesty laws to enact lex specialis provisions addressing it directly. At the same time, reforms must confront social barriers such as victim-blaming, patriarchal attitudes, and limited victim support. The study further argues that recent reforms in Malaysia, particularly the criminalisation of doxxing in 2025, demonstrate a pathway for the legislation, and that ASEAN-wide harmonisation could strengthen responses to this inherently transnational form of abuse. This issue aligns with ASEAN's broader commitment to address technology-facilitated violence and promote regional cooperation in strengthening digital safety and gender-based violence prevention.

Literature Review
Global Perspectives on Revenge Pornography
International scholarship has framed revenge pornography, or non-consensual intimate images (NCII), as a distinct form of gender-based violence and cyber-enabled abuse (Salter & Crofts, 2015). Jurisdictions such as the United Kingdom and Singapore have demonstrated that tailored legislative responses are both possible and effective.

In the United Kingdom, Section 33 of the *Criminal Justice and Courts Act 2015* explicitly criminalised the disclosure of private sexual images without consent, provided that the perpetrator intended to cause distress. While the statute was criticised for its intent requirement, it represented a milestone in recognising the unique harms of NCII (Walker & Sleath, 2017). The *Online Safety Act 2023* later extended criminal liability to threats of image disclosure, strengthening protections against coercion.

Singapore's Protection from Harassment Act (POHA), originally enacted in 2014, was amended in 2019 to include specific provisions against voyeurism, upskirting, and NCII. This comprehensive framework criminalises both the distribution and the threat of distribution of intimate images, providing for civil remedies such as protection orders alongside criminal sanctions. As Rogers (2024) notes, the inclusion of civil remedies recognises that criminal justice alone cannot address the multifaceted harm of NCII.

These benchmark jurisdictions demonstrate the importance of lex specialis frameworks: laws tailored to NCII reduce ambiguity, empower victims, and ensure proportional sanctions (Ramesh, 2025).

Malaysia's Fragmented Legal Framework
Malaysian law addresses NCII indirectly. The *Penal Code* criminalises "outraging modesty" under Section 354 and "insulting the modesty of a person" under Section 509. Section 233 of the *Communications and Multimedia Act 1998* prohibits the use of network services for offensive or indecent purposes. While these provisions have been used in prosecutions, they were not designed with NCII in mind and are conceptually inadequate.

Recent reform of the Penal Code in *2025* introduced new provisions targeting publishing identity information known as doxxing. It criminalises the unauthorised disclosure of personal data such as addresses, phone numbers, and workplaces with the intent to harass or alarm, including intimate images. However, while these reforms are a positive step, they still do not fully capture the seriousness of revenge pornography. The offence focuses on the intention

to cause distress or fear, rather than the breach of privacy and dignity that happens when intimate images are shared without consent. A clearer and more targeted law is therefore needed to recognise the non-consensual sharing of intimate images as a specific criminal act. Scholars argue that copyright law has occasionally been invoked in NCII cases, where victims attempt to claim ownership of images (Davis Kempton, 2020; Christianto, 2020). Yet, such approaches are impractical as copyright usually vests in the photographer rather than the subject, and intimate images are unlikely to be formally registered. This doctrinal gap highlights the inadequacy of Malaysia's legal framework in addressing NCII.

Indonesia's Partial Legal Recognition

Indonesia has enacted more explicit prohibitions, but they remain incomplete and weakly enforced. The *Pornography Act 2008* prohibits the creation, distribution, and possession of obscene materials. The *Information and Electronic Transactions (ITE) Law 2016* extends this prohibition to online platforms, making it an offence to distribute electronic documents or information with obscene content.

Despite these provisions, Indonesian scholars emphasise their limitations. Madani (2025) and Destriannisya (2024) argue that the absence of a dedicated NCII law leaves ambiguity in prosecutions. Enforcement is hampered by cultural resistance due to patriarchal norms and victim-blaming discourage reporting, while authorities often classify NCII cases as general obscenity rather than sexual abuse (Vakhitova,2019). Rasiwan and Terranova (2024) highlight how victims face secondary victimisation through stigma, with reputational harm outweighing legal remedies.

These doctrinal analyses demonstrate that while Indonesia has statutory tools on paper, the cultural and institutional environment undermines their effectiveness. Victims remain silenced, and perpetrators rarely face proportionate accountability.

Gender, Consent, and Victimisation

A recurring theme in the literature is the centrality of consent. Jurisprudence in the UK has clarified that consent to share intimate images privately does not imply consent for public dissemination (Gillespie, 2015). This principle resonates with broader feminist analyses: the violation lies not in the creation of images but in their non-consensual exposure.

Scholars underline that digital technologies complicate consent, as private images can be easily copied, manipulated, and disseminated globally (Blower, 2017; Attrill-Smith et al., 2021). Salter and Crofts (2015) argue that NCII should be understood not only as individual betrayal but as a systemic manifestation of gender inequality, where women are disproportionately targeted and judged.

In Malaysia and Indonesia, cultural and religious conservatism exacerbates victim-blaming. Studies from Spain (Sánchez Cócera, 2024; Palomino-Manjón, 2022) echo patterns also present in Southeast Asia that victims are blamed for "reckless" behaviour, while perpetrators are minimised. Indonesian research (Karlina, 2024; Destriannisya, 2024) demonstrates how women fear reputational ruin, discouraging them from pursuing legal remedies.

Thus, the literature establishes three central insights: (i) Malaysia lacks legal recognition of NCII, (ii) Indonesia criminalises obscenity but not NCII specifically, and (iii) both countries perpetuate victim-blaming and patriarchal attitudes that exacerbate harm.

Methodology
This research adopts a mixed-method design that integrates doctrinal legal analysis with empirical social research. The methodological approach was selected to provide a holistic understanding of revenge pornography in Malaysia and Indonesia, combining the strengths of legal examination with insights into public perceptions and awareness. In this way, the study avoids a purely theoretical analysis and instead grounds its arguments in both statutory frameworks and social realities.

The doctrinal component focused on the relevant statutes and amendments in Malaysia and Indonesia. In Malaysia, particular attention was given to Section 354 of the Penal Code on outraging modesty, Section 509 of the Penal Code on insulting the modesty of a person, and Section 233 of the Communications and Multimedia Act 1998. These provisions were studied alongside the more recent amendment introduced through the Penal Code (Amendment) in 2025, which, among other things, explicitly criminalised the act of doxxing. The doctrinal analysis sought to determine whether these provisions were capable of addressing the specific harms caused by the non-consensual distribution of intimate images. In Indonesia, the legal study concentrated on the Pornography Act 2008 and the Information and Electronic Transactions (ITE) Law 2016, as well as the manner in which these statutes have been interpreted and enforced. The analysis of both jurisdictions was framed in light of benchmark development in the United Kingdom which have enacted dedicated provisions criminalising revenge pornography, thereby providing a standard against which to evaluate the Malaysian and Indonesian legal responses.

The empirical element of the study was conducted in Malaysia and was designed to complement the doctrinal analysis by capturing the perceptions and lived experiences of members of the public. The empirical work consisted of two parts: an online survey and a semi-structured expert interview. The survey was conducted using Google Forms and comprised twenty-two questions divided into three sections. These included demographic questions, questions on awareness and experience of revenge pornography, and questions probing respondents' views on issues of consent and responsibility in the sharing of intimate images. The survey design relied on a mix of multiple-choice, yes/no, Likert-scale, and short-text responses. To ensure broad accessibility, the survey was distributed through social media platforms, student networks, and professional contacts using snowball sampling.

A total of 201 respondents participated in the survey. Inclusion criteria required respondents to be Malaysian residents aged eighteen years or older with sufficient English proficiency to complete the questionnaire. The demographic distribution showed that the sample was largely composed of young, digitally literate individuals, which was advantageous for the purposes of this research, given that younger age groups are more active in digital spaces where risks of revenge pornography are heightened. In order to maintain ethical standards, the survey was conducted anonymously and participants were informed of their right to withdraw at any time. Digital consent was obtained prior to participation, and no personally identifiable information was collected. Given the sensitivity of the subject matter,

respondents were also provided with links to counselling services in case the survey provoked emotional distress.

The second empirical element consisted of a semi-structured interview with a senior law lecturer from the Faculty of Law at Universiti Teknologi MARA (UiTM). The interview involved thirteen open-ended questions that explored the adequacy of existing Malaysian laws in addressing revenge pornography, lessons that could be drawn from comparative jurisdictions such as the United Kingdom, Singapore and Indonesia, and the practical challenges faced by law enforcement in protecting victims. The interview was conducted via the Zoom platform, recorded with prior consent, and later transcribed for analysis. Thematic analysis was then applied to the transcript to identify key concerns, recommendations, and insights from a doctrinal and policy perspective.

While original empirical data was collected in Malaysia, no similar survey was conducted in Indonesia. Instead, the Indonesian component of the study relied on doctrinal analysis supplemented by published scholarship. These secondary sources provided valuable insights into the application of the Pornography Act 2008 and the ITE Law 2016, as well as the socio-cultural challenges associated with enforcement. By triangulating doctrinal findings from Indonesia with the Malaysian survey and expert interview, the study was able to build a comparative narrative that situates Malaysia's challenges within a broader Southeast Asian context.

The analysis of data proceeded in two stages. Survey results were analysed descriptively, using frequencies and percentages to present demographic characteristics, awareness levels, and attitudes toward revenge pornography. The data was displayed in tables for clarity, while open-text responses were thematically examined to identify recurring perspectives, especially on issues of consent, privacy, and victim-blaming. The interview was analysed qualitatively using thematic coding to highlight patterns consistent with the survey results and doctrinal gaps. Doctrinal materials from Malaysia and Indonesia were then integrated into the analysis to produce a synthesis of legal and social dimensions of revenge pornography in both jurisdictions.

This methodological framework is justified for two reasons. First, doctrinal legal analysis on its own would have been insufficient to capture the lived realities of victims and the perceptions of the public. Second, the integration of empirical data with doctrinal findings strengthens the study's arguments by demonstrating the disconnect between law and social expectations. By combining doctrinal and empirical elements, and by situating Malaysia's challenges alongside those of Indonesia, this research provides a comprehensive account of revenge pornography in Southeast Asia.

Findings and Discussion
Demographic Profile of Respondents
The demographic data demonstrates that the sample for this study was predominantly young, educated, and digitally literate, a profile that reflects Malaysia's most active online community and, consequently, the population most at risk of experiencing or encountering revenge pornography.

Table 1
Gender Distribution of Respondents

Gender	Frequency	Percentage
Female	126	62.7%
Male	75	37.3%

A majority of respondents were female (62.7%), which mirrors international findings that women are more likely to be affected by image-based sexual abuse. The higher representation of women in the survey also allowed for clearer insights into gendered dimensions of victimisation and attitudes toward consent.

Table 2
Age Distribution of Respondents

Age Group	Frequency	Percentage
18–24 years	145	72.1%
25–30 years	6	3.0%
31–39 years	7	3.5%
40–50 years	25	12.4%
51–60 years	18	9.0%
Above 60 years	0	0.0%

The majority of respondents were between 18 and 24 years old (72.1%). This age group reflects the generation most engaged in digital platforms, highlighting the heightened risks faced by digital natives. Revenge pornography disproportionately affects this group because of higher online visibility and the prevalence of intimate digital communication within younger relationships.

Table 3
Educational Background of Respondents

Education Level	Frequency	Percentage
SPM/STPM	10	5.0%
Diploma/Matriculation/Foundation	50	24.9%
Degree	130	64.7%
Master	10	5.0%
PhD	1	0.5%

Note. SPM = Sijil Pelajaran Malaysia; STPM = Sijil Tinggi Persekolahan Malaysia (High School Certificate).

Most respondents held a university degree (64.7%), indicating that revenge pornography awareness and experiences are concentrated within educated groups who are also more likely to engage in online communication.

Table 4
Marital Status of Respondents

Marital Status	Frequency	Percentage
Single	109	54.2%
Married	52	25.9%
In a relationship	40	19.9%

The data shows that more than half of respondents were single, consistent with broader patterns in which unmarried young adults dominate online interaction and, therefore, exposure to risks of intimate image sharing.

Awareness of Revenge Pornography
Respondents were asked if they had heard the term "revenge pornography."
Table 5
Awareness of Revenge Pornography

Response	Frequency	Percentage
Yes	114	56.7%
No	63	31.3%
Maybe/Not sure	24	12.0%

A majority (56.7%) indicated familiarity with the term, although nearly one-third (31.3%) had never heard of it. Female respondents demonstrated higher levels of awareness (64.2%) compared to male respondents (44%). This is consistent with findings from Indonesia, where studies such as Karlina (2024) and Destriannisya (2024) similarly show that women are more informed about image-based abuse due to their higher vulnerability to victimisation. This gendered awareness suggests that revenge pornography is understood as a women's issue, yet at the same time highlights a troubling lack of recognition among men, who often comprise the audience for leaked material.

Experience with Image Sharing and Exposure
Table 6
Sharing of Intimate Images with Partners

Response	Frequency	Percentage
Yes	18	9.0%
No	167	83.0%
Thought about it but never did	16	8.0%

Only 9% of respondents admitted to having shared sexually explicit images with their partners. Women were slightly more likely to do so (12%) compared to men (4%), reflecting cultural expectations in relationships but also exposing them to higher risks.

Table 7
Victimisation – Images Shared Publicly

Response	Frequency	Percentage
Yes	10	5.0%
No	191	95.0%

Five percent reported that their intimate images had been shared publicly without consent. While this percentage may appear small, it indicates that actual cases exist and victims face long-term trauma once images are leaked. In Indonesia, Rasiwan and Terranova (2024) found similar patterns: cases are often underreported, but when they occur, the stigma and consequences are severe, often leading to silence rather than reporting.

Table 8
Encountering Others' Images Leaked Online

Response	Frequency	Percentage
Yes	121	60.0%
No	80	40.0%

A significant 60% reported having encountered others' intimate images being circulated online. This finding is highly relevant, as it shows revenge pornography is not confined to private victimisation but is instead part of wider digital culture. Indonesian research echoes this, revealing how leaked images are often treated as entertainment or social gossip, further perpetuating harm to victims.

Beliefs about Consent
Table 9
Consent to Public Sharing of Intimate Images

Response	Frequency	Percentage
Yes	20	10.0%
No	153	76.0%
Maybe	28	14.0%

Most respondents (76%) rejected the idea that sharing intimate images with a partner implies consent for public distribution. Ten percent believed consent extended to public sharing, while 14% were unsure. Open-ended responses revealed strong differences in perception. Some argued, "Consenting to send nudes is not the same as consenting to distribute them," affirming the principle of privacy. Others, however, stated, "When you share, you should

expect the risk that it might go public," reflecting a victim-blaming stance that normalises exposure.

In Indonesia, cultural studies report similar divisions. While many recognise the violation inherent in non-consensual distribution, patriarchal norms often reinforce the belief that women "invited" harm by taking or sharing intimate images. This mirrors the minority of Malaysian respondents who either supported implied consent or were undecided.

Comparative and Legal Discussion

The survey findings highlight the mismatch between public expectations and Malaysia's existing legal framework. Although three-quarters of respondents rejected implied consent, Malaysia's current legal provisions do not clearly define or prohibit non-consensual intimate image distribution. Victims are left relying on provisions of the Penal Code or the Communications and Multimedia Act, which were not designed for this offence.

Indonesia faces parallel challenges. The Pornography Act 2008 and the ITE Law 2016 prohibit obscene content and electronic abuse but lack provisions specific to revenge pornography. Cultural barriers and enforcement reluctance further weaken protection, with victims often discouraged from pursuing justice.

By contrast, the United Kingdom has enacted clear and comprehensive legislation. Previously, a person could only be charged if the sharing of private sexual images was done with the intent to cause distress. Section 66B, inserted into the Sexual Offences Act 2003 by Section 188 of the Online Safety Act 2023, now criminalises the sharing or threatening to share intimate photographs or films without consent, regardless of the motive. It also extends to fake or altered images, reflecting a stronger recognition of the harm caused when a person's sexual privacy and dignity are violated.

Malaysia's 2025 amendments to the Penal Code, which introduced an offence of doxxing, further highlight this gap. The provision focuses on the *intent* to cause distress or humiliation when someone's personal details or intimate photos are shared. However, it does not address the absence of *consent* as the key element of wrongdoing. As a result, the law punishes emotional harm but overlooks the core issue of violating a person's autonomy and sexual privacy.

Unlike the United Kingdom's Section 66B, which makes it a crime for a person to share intimate images without consent, Malaysia's Online Safety Act 2025 focuses more on the role of online platforms. It regulates platform duties under the Malaysian Communications and Multimedia Commission (MCMC), without creating personal criminal liability for non-consensual intimate image offences (NCII). The law places responsibility on social media companies and service providers to remove or limit harmful content and to keep users safe. The Malaysian Communications and Multimedia Commission (MCMC) oversees this process and can fine companies that fail to act. While this helps promote safer online spaces, it doesn't directly punish individuals who share intimate images without consent, leaving victims without strong personal protection.

Conclusion and Recommendations

This study set out to examine revenge pornography, or the non-consensual distribution of intimate images (NCII), from both a criminal law and socio-legal perspective, focusing on Malaysia while drawing important parallels with Indonesia. The research combined doctrinal legal analysis with empirical social research, including a public survey of 201 Malaysian respondents and a semi-structured interview with a legal expert. The findings reveal significant shortcomings in Malaysia's legal framework, mirrored by similar weaknesses in Indonesia, and highlight the urgency of regional and national reforms.

The doctrinal analysis demonstrated that Malaysia continues to rely on general provisions of the Penal Code and the Communications and Multimedia Act 1998 to address image-based sexual abuse. Although Sections 354 and 509 of the Penal Code provide partial remedies, and Section 233 of the CMA penalises the misuse of network services, none of these provisions explicitly criminalise the act of non-consensual image distribution. Recent amendments, including amendments to the Penal Code and the enactment of the Online Safety Act 2025 show that Parliament is willing to address emerging cyber harms, as evidenced by the introduction of a doxxing offence. Yet this willingness has not extended to revenge pornography, leaving a legislative gap that is inconsistent with both public expectations and international best practices.

Indonesia presents a parallel situation. While the Pornography Act 2008 and the Information and Electronic Transactions (ITE) Law 2016 provide some basis for addressing obscene content and online harassment, they lack a dedicated provision for NCII. Enforcement has been further undermined by cultural attitudes that stigmatise victims and discourage reporting. Scholarship from Indonesian legal commentators confirms that patriarchal values often shift responsibility onto victims, a dynamic also observed in a minority of Malaysian survey responses that normalised or excused public dissemination of intimate images.

The survey results reinforce the urgency of reform. A majority of Malaysian respondents (76 percent) rejected the notion that sharing intimate images with a partner implies consent for public distribution, while 56.7 percent had heard of revenge pornography and recognised it as a harmful act. At the same time, ten percent believed that consent was implied, and fourteen percent were unsure, indicating that victim-blaming narratives remain entrenched. These findings mirror Indonesian experiences, where cultural reluctance and patriarchal interpretations of consent hinder victim protection. Importantly, the survey also showed that women were both more aware of revenge pornography and more likely to have been victimised, while men were more likely to encounter leaked images online, a pattern that underscores the gendered nature of the offence.

The experience in the United Kingdom shows that it is both possible and important to have a clear law on non-consensual sharing of intimate images (NCII). Section 33 of the UK's Criminal Justice and Courts Act 2015, later replaced by Section 66B of the Sexual Offences Act 2003, inserted through Section 188 of the Online Safety Act 2023 makes it an offence to share intimate images without consent, no matter what the motive is. It also covers situations where someone threatens to share those images. By focusing on consent rather than intent, the UK law better reflects the real harm caused — the loss of control and violation of privacy — and offers stronger protection than what currently exists in Malaysia or Indonesia.

This paper therefore, makes three central recommendations. First, Malaysia and Indonesia should enact specific legislation or amend their laws to clearly define and criminalise revenge pornography, encompassing both non-consensual dissemination and threats of dissemination. The recent doxxing amendment in Malaysia provides a useful legislative model, as it shows Parliament's willingness to name and address digital harms directly. The same logic should extend to NCII, where sexual privacy deserves the same level of protection as informational privacy. Second, any new law should include victim-centric legal rights and remedies such as personal takedown rights, anonymity protections during trial, and access to counselling services. Third, broader awareness campaigns are essential to challenge the persistent narratives of victim-blaming. The survey revealed that a minority of respondents continued to hold patriarchal views that normalised exposure of intimate images. Targeted education, particularly among men, is necessary to shift cultural attitudes toward greater respect for digital consent and sexual privacy.

In conclusion, revenge pornography in Malaysia and Indonesia highlights a wider Southeast Asian gap in protecting victims of image-based sexual abuse. Both jurisdictions have taken steps to address cyber-related offences, but their failure to explicitly criminalise NCII creates a significant disconnect between law and public expectations. The empirical findings of this study demonstrate that the public recognises revenge pornography as a breach of trust and overwhelmingly rejects implied consent. The law, however, has yet to respond adequately. Malaysia's decision to legislate against doxxing shows that reform is possible when harms are acknowledged. Extending this recognition to revenge pornography is the next logical and necessary step. The originality of this study lies in its integration of doctrinal and empirical analysis to reveal how legal, social, and institutional factors shape responses to revenge pornography, providing a comparative foundation that may support the development of an ASEAN framework for legal and policy reform.

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