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# Trends & issues

in crime and criminal justice



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**Foreword** | *The rapid development and adoption of online digital technologies has had a profound effect on the way young people conduct their social relationships. The emergence of sexting, or the distribution of sexually explicit photos and videos, has gained widespread attention and raised moral concerns. However, there remains little policy-relevant research on the prevalence of sexting and its impact on young people.*

*This study provides a valuable contribution to the evidence base. In a survey of over 2,000 respondents, almost half reported having sent a sexual picture or video of themselves to another party, while two-thirds had received a sexual image. Sexting was prevalent among all age groups, with 13 to 15 year olds particularly likely to receive sexual images. Sexting was prominent among homosexual and bisexual respondents. Most sexting occurred between partners in committed relationships.*

*The study found very little evidence of peer pressure or coercion to engage in sexting. Rather, young people reported engaging in the practice as a consensual and enjoyable part of their intimate relationships. The paper considers the implications of this for legal and policy responses to sexting.*

Chris Dawson APM

## Sexting among young people: Perceptions and practices

Murray Lee, Thomas Crofts, Alyce McGovern & Sanja Milivojevic

The way in which young people have integrated online and digital technology into their personal relationships and sexual development is an important emerging issue for researchers and policymakers. Over the past few years news media in Australia, North America and other Western countries have reported with concern on cases of sexting where minors have used mobile phone digital cameras to manufacture and distribute sexual images of themselves and/or others, in some cases falling foul of child abuse material or child pornography laws (Crofts & Lee 2013; Salter et al. 2013; Lee et al. 2013).

Sexting is a term that originated in the media—a portmanteau created by collapsing the terms sex and texting. It is generally defined as the digital recording of nude or sexually suggestive or explicit images and their distribution by mobile phone messaging or through social networking platforms such as Facebook, Instagram and Snapchat. Some commentary even extends the definition to the sending of sexually suggestive texts. As the Law Reform Committee of Victoria notes, the term sexting is evolving and ‘encompasses a wide range of practices, motivations and behaviours’ (2013: 15). These range from a person sharing a picture with a boyfriend or girlfriend to the boyfriend or girlfriend showing the picture to someone else, the recording of a sexual assault, or even an adult sending an explicit text to groom a child. While this is commonly referred to in media and public discourse as sexting, young people themselves do not typically use the term, preferring instead to use terms such as ‘naked selfies’, ‘nudies’ and ‘banana pics’ to describe the practice; so although the term sexting is deployed here, its problematic nature is also acknowledged.

This paper presents the results of the survey component of a two-year multi-method Criminology Research Grant-funded project, and focuses on the prevalence and context of sexting among young people and their motivations for doing so. These results may have significant implications for the ways in which legislators, educators and policymakers might seek to address such behaviours by young people.



## Current knowledge

Internationally, only a small number of surveys have attempted to understand the dynamics of sexting among young people. Such surveys have not only used differing definitions of sexting, but have also deployed diverse methodologies in recruiting respondents. As a result, what is known about the practice and prevalence of sexting varies widely.

For example, in the United States of America a survey for Pew Internet (Lenhart 2009) found relatively low levels of sexting among young people, with only four percent of cell-owning young people aged 12 to 17 reporting 'sending a sexually suggestive nude or nearly-nude photo or video of themselves to someone else' (Lenhart 2009: 4). Fifteen percent of those aged 12 to 17 reported having received such an image.

In contrast, an online survey by Cox Communications (2009) of 655 teenagers aged 13 to 18 found a relatively high prevalence of sexting, with around 20 percent of respondents reporting having engaged in the sending, receiving and/or forwarding of sexually suggestive nude or nearly-nude photos via phone or computer. While over 33 percent knew of a friend who had done so, only nine percent of respondents actually reported producing and sending images themselves, and only three percent reported passing images of others on to third parties.

Similarly, Strassberg (2012) sampled 606 students from a single high school in the southwestern USA and found that almost 20 percent of participants reported sending a sexually explicit image of themselves, with 40 percent having received a sexually explicit picture. Of those, over 25 percent indicated they had forwarded a picture to others.

More recently, Mitchell et al. (2014) found that 26 percent of students they surveyed reported sending a sexually explicit photo of themselves, and more than half of those surveyed aged 16 to 18 had received a sexually explicit text message.

In the Australian context, the Parliamentary Joint Select Committee on

Cyber-Safety's survey, which informed the *High-wire act: cyber safety and the young* (2011) report, found that from a total of 33,751 young people surveyed, 91.2 percent of respondents reported 'they would not or have not sent nude or semi-nude pictures via new technologies' (PJSCoCS 2011: 138).

The available qualitative research on sexting adds some context to these survey results. Both Ringrose et al. (2012, 2013) and Albury et al. (2012) highlight the gendered dynamics of sexting and how it occurs in the context of a 'gendered double standard'. They note that young women and girls generally have more to lose when 'consensual' sexting goes wrong, or when young women feel pressured into sending an image. The research of Ringrose et al. (2013) in two disadvantaged schools in London highlights how the coercive nature of gendered relationships extends from real life into the digital realm. Albury et al.'s Australian based study provides further context by critically reflecting on just how widespread the pressure to sext might be, as well as underlining the mutual excitement of consensual sexting.

## Methodology

Survey questions for this study were developed over a twelve-month period and tested on the study's target demographic— young people between the ages of 13 and 18. This process involved consultation sessions with the NSW Commission for Children and Young People's youth advisory group, which provided valuable feedback on the constitution of the questions and usage of terminology. Following these consultations and further trialling the questions were refined, resulting in the final survey which consisted of 34 items. This paper reports on a small number of these items.

Questions were aimed at capturing data on young people's perceptions of sexting, their practice of and motivations for sexting, and their understanding of the law in relation to sexting. In addition, the survey collected a significant amount of demographic information on the age, religion, gender,

urban/rural location, sexuality and ethnicity of respondents.

On the basis of feedback from the youth advisory group on how young people understand sexting, the survey defined sexting as 'the sending and receiving of sexual images', which was explained further: 'Any time we ask about "sexual pictures/videos", we are only talking about sexually suggestive, semi-nude, or nude personal pictures and/or videos (like nudes, naked selfies, banana pics etc)'. Specific questions on whether or not the images were of oneself or others were also included. The survey was made available online via Survey Monkey between July and October 2013 and was administered through the University of Sydney Law School. A Facebook page was also developed to link to the survey. The study was promoted via the Australian Broadcasting Commission's Triple J youth-oriented radio station through its *Hack* current affairs program, Facebook, Twitter, the Universities of Sydney, Western Sydney and New South Wales, and a large range of youth service providers. While the survey was aimed at those aged 13 to 18, older participants were also able to complete the survey, capturing useful comparative data. The data were statistically analysed using the SPSS program.

In line with the ethical requirements of the project, a range of protections were put in place so that participants were aware of the sexual nature of some of the questions and excluded if they were under the age of 13. Throughout the survey respondents were reminded that the survey would contain questions about sexual pictures, enabling them to reflect on the nature of the survey and withdraw from participation at any stage.

The range of questions asked and the relative paucity of existing quantitative research in this area in Australia means the survey results add significantly to the knowledge of young Australians' perceptions and practices of sexting. Furthermore, while the cohort of respondents does not constitute a representative population sample, and the online nature of the survey

means that individuals typically overlooked by traditional recruitment methods may have been captured, the high number of participants makes the results of the survey particularly compelling.

## The sample

A total of 2,243 respondents attempted the survey, with 1,416 completing every question (a 63% completion rate). The sample cohort provided a good gender balance of 47 percent male and 52 percent female respondents, with less than 1 percent of respondents (0.5%) identifying as other. This latter category allowed an open response and was designed to capture respondents identifying as trans, intersex or of other gender variance.

Twenty-eight percent of respondents were aged 13 to 15 years, while 42 percent were

aged 16 to 18. Nine percent were aged 19 to 21, seven percent were aged 22 to 24 and 13 percent were aged 25 and above. This spread of age groups allowed the study to make some comparisons between groups of young people, as well as between young people and groups of younger and older adults.

The study also captured data on sexuality, with nine percent of respondents indicating they were bisexual, two percent indicating they were gay, one percent indicating they were lesbian and six percent indicating they were 'questioning'.

## Results

### Prevalence

Of the entire sample, 49 percent of respondents reported having sent a sexual picture or video of themselves to another

party. Additionally, 67 percent of the cohort had received a sexual image.

While such figures appear to indicate a high prevalence of sexting, when broken down they demonstrate a number of differences in the practices and perceptions of young people who sext.

### Prevalence by age

As seen in Table 1, high numbers of respondents reported sending sexual images across every age category. The youngest cohort of respondents, however, were less likely to have sent an image of themselves than any other age group.

A similar distribution is revealed by the question of receiving sexual images (see Table 2). While fewer of those aged 13 to 15 reported receiving sexual images at 62 percent, they were far more likely to receive than send an image.

Table 1 Have you ever sent a sexual picture/video (by age)			
	Yes	No	Total
13–15	172 (38%)	276 (62%)	448
16–18	340 (50%)	346 (50%)	686
Adult (19+)	256 (59%)	179 (41%)	435
Total	768	801	1,569

Note: Pearson  $\chi^2(2) = 34.15, p < .001$

Source: University of Sydney online sexting survey 2013

Table 2 Have you ever received a sexual picture/video (by age)			
	Yes	No	Total
13–15	276 (62%)	169 (38%)	445
16–18	479 (70%)	204 (30%)	683
Adult (19+)	296 (68%)	138 (32%)	434
Total	1,051	512	1,562

Note: Pearson  $\chi^2(2) = 37.15, p < .001$

Source: University of Sydney online sexting survey 2013

### Number of sexting partners

The survey asked respondents how many people they had sent sexual images to and how many people they had received images from. As indicated in Table 3, the majority of every age and gender cohort who had sent a sexual image had sent one to only one person, or to no-one, in the past 12 months.

### Gender

Much of the academic and popular discourse about sexting has focused on its differing gender dynamics; that is, there has been a perception that females are more likely to send images, with males being the likely recipients. Overall our results indicate that females were slightly more likely (50%) than males (48%) to have sent a sexual image, though this difference was not statistically significant. With reference again to Table 3, across the gender groups males who had sent a sexual image were more likely to have sent to two or more people (41%) than females (29%), indicating a difference in sending behaviours—that is, males were more likely, overall, to send sexual images to more sexting partners than females. These differences evaporate, however, when we examine the younger respondents, with post hoc tests indicating that only adult females were significantly less likely than other groups to have sent images to more than five people.

Gender was also a factor in the receipt of sexual images. As the data in Table 4 indicates, of those who had ever received

a sext, the largest percentage of young people from all the gendered categories (except girls aged 16 to 18) had received a sexual image from two or more people in the past 12 months. Post hoc tests confirmed that younger female respondents were more likely than adult females to have received sexual images from more than five people in the past 12 months (24%). They also confirmed that males aged 13 to 15 and 16 to 18 were similar to girls aged 13 to 15 in that they were more likely to have received images from multiple persons. For both adult groups and females aged 16 to 18, post hoc tests indicated that the majority received sexual images from one or no partners in the past 12 months.

### Sexuality

Unlike previous surveys, this survey also sought to understand the correlation between sexuality and sexting. While these sample sizes were small and care must therefore be taken in interpreting the data, results indicate that, across the age cohorts, male respondents identifying as gay were significantly more likely to have sent or received a sexual image (81%). Similarly, respondents who identified as lesbian (65%) or bisexual (67%) were also more likely to have engaged in the practice than their heterosexual counterparts.

### Context

#### Sexting and Relationships

The survey also sought to establish the nature of the relationships between those

who send and receive sexual images. Implicit in much of the existing popular discourse on sexting is that it is a practice engaged in by singles or those in the early stages of a relationship; that is, it is part of getting to know someone or attracting the attention of the receiver so that a relationship of some kind might ensue.

The results in Table 5 indicate that respondents in a long-term or casual relationship (with the exception of married respondents) were more likely to have sent a sexual image of themselves than those who were not in a relationship or who had just started seeing someone.

These data are somewhat triangulated by the fact that, as Table 6 illustrates, those who reported being in a long-term relationship were also most likely to have sent sexual images to only one person. The same was true for those who were married.

### Motivations

The question, ‘Why did you send a sexual image or video?’ importantly gives us some sense of what motivates young people to engage in sexting.

While much media, educational and political discourse has highlighted gendered pressure (see Karaian 2012; Salter et al. 2013), exploitation and coercion, this is not the way respondents in this study expressed their motivations.

Table 3 How many people have you sent a sexual picture/video of yourself to (by age and gender)

	Male 13–15	Male 16–18	Male Adult	Female 13–15	Female 16–18	Female Adult	Total
No-one in past 12 months	11 (16%)	18 (12%)	22 (22%)	10 (10%)	32 (18%)	36 (23%)	129 (17%)
1 Person	30 (42%)	67 (44%)	42 (42%)	47 (48%)	94 (52%)	91 (59%)	371 (49%)
2–5 people	19 (27%)	46 (30%)	24 (24%)	34 (34%)	38 (21%)	26 (17%)	187 (25%)
More than 5	11 (16%)	21 (14%)	11 (11%)	8 (8%)	18 (10%)	2 (1%)	71 (9%)
Total	71	152	99	99	182	155	758

Note: Pearson  $\chi^2(15) = 44.16, p < .001$

Source: University of Sydney online sexting survey 2013

**Table 4 How many people have you received a sexual image from**

	Male 13-15	Male 16-18	Male Adult	Female 13-15	Female 16-18	Female Adult	Total
No-one in past 12 months	6 (5%)	22 (9%)	24 (21%)	8 (5%)	27 (12%)	46 (26%)	133 (13%)
1 Person	40 (33%)	74 (31%)	44 (38%)	52 (35%)	104 (44%)	88 (50%)	402 (39%)
2-5 people	51 (42%)	103 (43%)	29 (25%)	54 (36%)	73 (31%)	34 (19%)	344 (33%)
More than 5	26 (21%)	39 (16%)	19 (16%)	36 (24%)	30 (13%)	9 (5%)	159 (15%)
Total	123	238	116	150	234	177	1,038

Note: Pearson  $\chi^2(15) = 104.50, p < .001$

Source: University of Sydney online sexting survey 2013

**Table 5 Have you ever sent a sexual picture/video of yourself (by relationship status)**

	Not in a relationship	Just started seeing someone	Casual/dating relationship	Long-term relationship	Married	Other	Total
Yes	288 (40%)	63 (53%)	86 (62%)	218 (62%)	18 (41%)	27 (53%)	700 (49%)
No	435 (60%)	56 (47%)	52 (38%)	132 (38%)	26 (59%)	24 (47%)	725 (51%)
Total	723	119	138	350	44	51	1425

Note: Pearson  $\chi^2(5) = 61.02, p < .001$

Source: University of Sydney online sexting survey 2013

In the data presented in Table 7, respondents were asked to pick three reasons they were motivated to send a sexual image. These responses have been disaggregated by age and gender.

These data suggest that young women first and foremost sent images to be ‘fun and flirty’; secondly ‘as a sexy present’; and thirdly to ‘feel sexy and confident’. This was very closely followed by ‘because I received one.’

Teenage boys’ responses differed somewhat. They suggested firstly that they were motivated to send an image ‘to be fun and flirty’; secondly, ‘because I received one’; and thirdly ‘as a sexy present’.

## Discussion

As noted in the literature review, the prevalence data on sexting and young people is varied. Recorded rates of prevalence fluctuate from a low of two percent up to the almost 50 percent reported for those aged 16 to 18 and the 38 percent reported for those aged 13 to 15.

Rates of recorded prevalence appear to be closely related to the methodologies, definitions and samples of specific research projects.

This project used an online survey to recruit participants and, while the large sample size allowed for some detailed statistical analysis, it is likely that active

participants in online cultures will have been over-represented.

However, it is also possible that attempts at representative sampling through phone recruitment—which has been used internationally in a number of international surveys, finding much lower prevalence rates—would likely see prevalence under-reported. For example, having to gain consent from both the parent and participant before the survey is administered would seem inevitably to lead to under-reporting or non-participation by the very individuals who involve themselves in the activity. Thus, while caution should be urged in looking at the prevalence data presented here, it would appear to indicate

that sexting among young people is not a marginal activity.

The data also indicates that most of those who do engage in sexting do so 'consensually' and with few sexting partners. That is, a majority of respondents aged 13 to 15 (58%) and 16 to 18 (63%) who had ever sent a sexual image had done so with either no-one or one person in the past 12 months. And while a significant number of respondents who had sent a sexual image had sent it to two to five people (31% and 25% respectively), few had sent one to more than five people (11% and 12% respectively) in the past 12 months. The data thus suggests a small proportion of very active participants, with these participants increasing their risk of negative outcomes.

Evidence from existing qualitative research (Albury 2012; Ringrose et al. 2013) has highlighted the gendered double standards inherent in sexting, with boys being less likely to be shamed or humiliated by the circulation of their photo to third parties than girls. The data indicated that a small but not insignificant number of girls (and boys) send sexual images to multiple partners. It follows that they are more at risk of these negative outcomes through the behaviours of their sexting partners.

Returning to the majority of the cohort, the frequency data indicated that most of the respondents were generally sexting within some kind of relationship and with only one partner. This was reinforced by the fact that those not in a relationship were much more likely to send an image to more than five people (13%).

Indeed, the data seems to reinforce findings from the US (Mitchell et al. 2012) that suggest most young people who engage in sexting do so with a trusted partner. In doing so they appear to be minimising their risks, something that it could be argued should be taken into consideration by policymakers. Such findings contrast sharply with much of the media and popular discourse, which constructs sexting by young people in terms of a moral panic.

While the data from this study does not allow it to be conclusively stated that those in a relationship are actually sending the images to their partner in that relationship, nor can it be established with certainty that the respondent was in a relationship when they sent or received a sexual image, these data certainly seem to suggest this.

If one cohort is over-represented in the sexting culture it is those respondents who identified as gay or bisexual. More analysis is needed here due to the small sample size surveyed, but gay online cultures that have proliferated around online hook-up applications such as Grindr, SCRUFF and GROWLr (see Gudelunas 2012) may play some role in normalising the exchange of sexual images and videos for these groups.

The data on relationships also make sense in terms of the types of motivations respondents experienced and expressed. Most young people who sent images reported they did so to be 'fun and flirty'. And while girls also said it was often about 'a sexy present' for a romantic partner, or to 'feel sexy and confident', boys reported that it was 'because I received one'.

These motivations appear consistent with a system of mutual exchange where particular expectations are constructed. The inherent risk of the activity, while obviously something to be managed by most participants, is also part of the attraction; and it is important to recognise that for most participants who engage in sexting, negative motivations are not responsible for their sexting behaviours.

Table 6 How many people have you sent a sexual picture/video of yourself (by relationship status)

	Not in a relationship	Just started seeing someone	Casual/dating relationship	Long-term relationship	Married	Other	Total
No-one past 12 months	51 (18%)	13 (21%)	11 (13%)	38 (17%)	5 (28%)	2 (7%)	120 (17%)
1 Person	112 (39%)	26 (41%)	33 (38%)	144 (66%)	11 (62%)	13 (48%)	339 (48%)
2-5 people	87 (30%)	18 (29%)	36 (42%)	25 (12%)	1 (6%)	7 (26%)	174 (25%)
More than 5	38 (13%)	6 (10%)	6 (7%)	11 (5%)	1 (6%)	5 (19%)	67 (10%)
Total	288	63	86	218	18	27	700

Note: Pearson  $\chi^2(15) = 70.49, p < .001$

Source: University of Sydney online sexting survey 2013

Table 7 Why did you send a sexual picture/video of yourself

	Frequency Total	Male Teen	Male Adult	Female Teen	Female Adult	$\chi^2$	p value
Get or keep a guy/girl's attention	194	51a (10%)	26b (16%)	85b (14%)	32a, b (12%)	5.87	0.12
Boyfriend/Girlfriend pressured me to send it	136	19a (4%)	4a (2%)	77b (13%)	36b (13%)	42.49	0.00**
As a sexy present for boyfriend/girlfriend	361	83a (16%)	57b (35%)	112a (18%)	109b (40%)	80.26	0.00**
To feel sexy or confident	239	45a (9%)	29b (18%)	90b (15%)	75c (28%)	50.17	0.00**
To get a guy/girl to like me	118	25a (5%)	12a, b (7%)	56b (9%)	25b (9%)	8.44	0.04*
Pressure from friends	30	7a (1%)	1a (<1%)	19a (3%)	3a (1%)	7.67	0.05
To get compliments	130	25a (5%)	18b (11%)	53b (9%)	34b (13%)	16.03	0.00**
To be included/fit in	43	6a (1%)	4a, b (3%)	31b (5%)	2a (<1%)	20.86	0.00**
To be fun/flirty	397	119a (23%)	60b (37%)	132a (21%)	86b (32%)	23.50	0.00**
To get noticed or show off	132	39a (8%)	24b (15%)	50a (8%)	19a (7%)	9.53	0.02*
Because I received one	288	116a (23%)	46a (28%)	86b (14%)	40b (15%)	26.99	0.00**
I don't know	60	18a, b, c (4%)	2c (1%)	36b (6%)	4a, c (2%)	13.92	0.00**
Other (please specify)	108	39a	11a	35a	23a	2.32	0.51

\*indicates significance at the p<.05 level

\*\*indicates significance at the p<.001 level

Source: University of Sydney online sexting survey 2013

## Conclusion

With media stories of young people being prosecuted for child pornography or child abuse material offences, and tough legislation in place that can ensnare young people who engage in sexting, the phenomenon has become an important topic in recent times. Attempts to protect children and to regulate childhood and teen sexuality have created an environment where young people can be criminalised for essentially 'consensual' sexting. Indeed, under current legislation in many jurisdictions

across Australia young people between 16 and 18 years can have consensual sex, but if they send an explicit photo to their partner they may fall foul of child pornography or child abuse material laws.

While the definition of sexting is broad and can incorporate everything from mutually consensual exchanges of images to coercive and exploitative behaviours, the vast majority of young people who engage in the sending and receiving of explicit images do so voluntarily. Their self-image of their behaviour appears greatly at odds

with the laws that seek to protect them and which may actually criminalise them. As Cupples and Thomson (2010: 1–17) argue, interaction with new technologies may 'leave existing gender relations intact, but is subtly reconfiguring them in a way which might be empowering to the teenagers concerned or at the very least [is not] experienced in a negative way'.

That is not to suggest that sexting is without risks, or that there are not broader social pressures that might impact on the volition of young people engaging in such

behaviours (Lee and Crofts 2015). Indeed, there is a gendered double standard around sexting that means young women are more likely to be embarrassed or shamed if things go wrong—although that is not to say boys cannot be shamed or embarrassed as well. But the policy emphasis here should not be on problematising the behaviour of those who sext through embarrassment or shame; rather, it should focus on problematising the behaviour of those who breach the trust of their sexting partner (see Dobson and Ringrose 2015).

Despite this, these findings suggest that the majority of sexting occurs without negative consequences and within existing relationships. It also suggests most sexting occurs between a small number of sexting partners.

The data also suggests that a significant number of young people engage in consensual sexting and that only a small number do so frequently.

All of this has significant implications for educators and policymakers. Many education campaigns have been based on abstinence or 'responsibilisation' messages (Salter et al. 2013; Dobson and Ringrose 2015); that is, they present sexting as either always a danger to young participants outweighing any pleasurable benefits, or as an activity that has shameful, negative consequences for participants, young women in particular. This frames the responsibility for consequences that should have been foreseen as the young woman's, in much the same way as early sexual assault prevention literature did. The data suggests, however, that these messages do not equate with the motivations of young people engaged in these activities. Rather, a more realistic and effective approach to regulating such behaviour might be aligned with harm minimisation—that is, it would recognise that young people who have online lives will almost inevitably experiment with sexting at some point and there is a

need to attempt to minimise the potentially negative outcomes of the behaviour. Apps such as Snapchat move us closer to this but are certainly not a panacea, as romantic partners may well also want to collect images of each other—a practice apps such as Snapchat make more difficult, but not impossible. More effective may be education that seeks to prepare young people with a 'sexual ethics' (Carmody 2014). Such an ethics may allow participants to understand the context of their behaviour and enable them to identify when they are exploiting others or being exploited. It could also be effective in ensuring that when young people enter this exchange economy they are aware of the parameters and mutual expectations of their practice.

Some states such as Victoria have already moved towards law reform in this area with the introduction of new laws criminalising non-consensual distribution or threatened distribution of intimate images, alongside new defences for child pornography offences for young people in certain situations. These new offences may have their merits; however, there may be a risk of this becoming a net-widening process, as it currently appears that in Australia few young people are actually prosecuted for child pornography offences for consensual sexting alone (Victorian Law Reform Committee 2013: 103–125). Those cases that are prosecuted tend to involve aggravating factors. Indeed, police and prosecutor discretion presently appears to keep most young people involved in consensual sexting out of the criminal justice system.

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