**SG HER EMPOWERMENT limited ("SHE”)**

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SHADOW REPORT FOR SINGAPORE: SUBMISSION FOR THE 85TH PRE-SESSIONAL WORKING GROUP OF CEDAW

In relation to Singapore’s Sixth Periodic Report on the United Nations Convention on the Elimination of All Forms of Discrimination against Women (CEDAW)

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# Executive Summary

## General Recommendation 35 (2017) and Report of the Special Rapporteur on violence against women (2018)

1. This Shadow Report pertains to CEDAW’s two source materials relating to Gender-Based Online Harms:
2. CEDAW/C/GC/35: General recommendation No. 35 on gender-based violence against women, updating general recommendation No. 19 (2017); and
3. A/HRC/38/4: Report of the Special Rapporteur on violence against women, its causes and consequences on online violence against women and girls from a human rights perspective (2018)

## Main critical point: The prevalence and normalization of Gender-Based Online Harms (“GBOH”)

1. As a country with one of the highest rates of digital penetration in the world, Singapore enjoys the many benefits of the internet but is also subject its risks and threats. In particular, the digital sphere provides new avenues for gender-based harms to take place, and for such actions to take new forms and/or be carried out by new means.
2. Examples of GBOH include:

1. Online impersonation;
2. Online dissemination of false information without consent;
3. Online dissemination of true information without consent;
4. Dissemination of media (photos, videos, representations) of a person without consent;
5. Solicited and unsolicited communications;
6. Cyberstalking;
7. Harassment;
8. Threats and written abuse.
9. An online sensing poll conducted in January 2022 among 1,049 Singaporeans and Singapore Permanent Residents[[1]](#footnote-1), uncovered the following:
10. 3 in 10 people in Singapore have been affected by GBOH including fake identities, receipt of unsolicited materials, cyberstalking and online bullying;
11. Victims were most likely those from the younger age group of 15-35;
12. 57% of respondents were unaware of help-seeking avenues. Among them, 60% of female respondents shared having low or no awareness of how to seek help for online harms; and
13. 43% of respondents who have experienced online harms said they will not take action because they think it will not make a difference.

### Recommendation

1. GBOH is an emergent, complex, and pressing issue in Singapore. In 2022, the issue of GBOH (and online harms more broadly) has received more attention by the government and other stakeholders. Given the fast-evolving nature of this problem, the legal, investigative, regulatory and social frameworks are still being developed. It is necessary that these developments take place quickly and concurrently.
2. The insidious and widespread nature of GBOH, combined with the trend of low help-seeking behaviour and the pervasive use of technology by modern-day girls and women in all areas of their lives (finances, working, eating, socialising, studying, dating, *etc*.), a whole-of-society effort is necessary to address this growing scourge.

# About SHE

1. SHE is an independent non-profit organisation with Institution of Public Character status in Singapore, that strives to empower girls and women through community engagements and partnerships.
2. Inspired by the public-private-people partnership work of the Sunlight Alliance for Action to tackle online harms, especially those targeted at women and girls (“Sunlight AfA”), SHE was founded in 2022 when its leadership team felt that a community effort was needed to tackle emerging new issues for women, including GBOH. It is committed to work closely with partners, including the government, to tackle GBOH.
3. Hence, its first key project will be to set up SHECARES@SCWO, **Singapore’s first gender-based online harms support centre, alongside a suite of empowering initiatives in the spirit of public-private partnership (see paragraph 23-27 for further details).**
4. **In addition,** SHE will also work towards being a platform for broader mainstream issues such as workplace fairness and equality, the roles of women and men in the home, and issues affecting youth.

# The State of GBOH in Singapore

## State of affairs

1. The scale and speed of information sharing on the internet, the fast-evolving nature of technology, and the challenges of regulating digital spaces, make online/technology-facilitated GBOH a real threat. As girls and women now spend increasingly more time online, they are more likely than ever to encounter these perils.
2. In addition to the data highlighted in the Executive Summary, the same sensing poll and further engagements by the Sunlight AfA have found that:
3. 39% of females do not feel safe from online harms, compared to 28% of men[[2]](#footnote-2)
4. Females aged 25-34 are mostly likely to experience GBOH[[3]](#footnote-3)
5. Segments that are potentially more susceptible to GBOH include those in need for emotional connectedness, such as students lacking attention and/or affirmation, those from lower socio-economic backgrounds, and those with strong and public online presence[[4]](#footnote-4)
6. The need to regain a sense of control, usually after a GBOH has occurred, becomes a motivation to engage help-seeking resources[[5]](#footnote-5)
7. The prevalence of harmful online conduct likely also contributes to some sense of normalisation of such harms. For example, Singapore-specific data from a separate global study done by Ipsos shows that:
8. Across different age groups, online harms are the most prevalent among Gen Zs; and
9. 16% of Gen Zs find sending unrequested, sexually explicit images acceptable as compared to 9% of millennials and 10% of Gen Xers.[[6]](#footnote-6)

## Existing legislation

1. There is presently no codified legislation covering all possible online harms. The type of acts or offences that may take place online cover a wide spectrum, and there is in fact no legal definition or common understanding on what the term “online harms” or “gender-based online harms” means. Legislation presently in force to protect women against online harms include the:
2. Computer Misuse Act;
3. Children and Young Persons Act 1993;
4. Defamation Act 1957;
5. Films Act 1981;
6. Foreign Interference Countermeasures Act 2021;
7. Penal Code 1871;
8. Protection from Harassment Act 2014; and
9. Undesirable Publications Act 1967.

## Existing efforts

1. Online harms and GBOH have begun to receive attention from the Singapore Government.
2. The White Paper on Singapore Women’s Development, released in April 2022, identified online harms as part of its action plans within the protection against violence and harms. Specifically, Action 14 of the White Paper commits to raise awareness and accessibility of resources for victims of online harms. This was done through the Alliance for Action to tackle online harms, especially those targeted at women and girls (see paragraph 17).
3. From July 2021 to July 2022, and following a series of conversations with some 300 stakeholders from diverse backgrounds, the Ministry of Communications and Information (“MCI”) convened the Sunlight AfA, a public-private-people partnership to tackle online harms. The Alliance aimed to explore ways to better support victims of online harms, close the digital safety gap especially for women and girls, and empower Singaporeans to embrace the digital future with confidence. This was done through 5 workstreams, namely Public Education; Research; Victim Support; Volunteerism and Partnerships; and Youth Engagement.
4. Following that, from 13 July to 10 August 2022, MCI also conducted a Public Consultation on Enhancing Online Safety For Users in Singapore. A series of public engagement sessions were held to hear suggestions on how Singapore could improve online safety on social media, and public feedback to proposed regulatory measures including a Code of Practice for Online Safety. The proposed Code will require social media services to put in place systems and processes to mitigate users’ exposure to harmful content, and ensure that users can easily report harmful content to the services. Many agreed that imposing requirements on social media services to improve online safety was important, and also spoke about the importance of public education to guide the young on navigating the online space.

# Recommendations

## Areas of opportunity

1. As an emergent complex issue, there is a dearth of research, data, and overall understanding of this emerging space. Specifically, there is:
2. No legal definition or common understanding on what the term “online harms” or “gender-based online harms” means;
3. No publicly-available repository of data on the types and nature of the online harms and GBOH, the profile of the victims and perpetrators, and rising trends, without which there can be no clear understanding of the psychological effects on the victim’s life and well-being, *etc*.; and
4. No one-stop centre and/or resource specifically for victims of GBOH, which may perpetuate the issue of under-reporting
5. The lack of legal definition or common understanding means that acts which are “rising trends” may not be viewed as harmful until it is too late (*e.g.* dangerous social media challenges). This may also result in people having the perception that unless something is made illegal at law, it is not harmful *per se*. This fails to account for “lawful but awful” actions, such as online body-shaming, which may well be just as harmful to an individual as online harassment or cyber-stalking. There is thus room for further research and public engagement on what constitutes an online harm/GBOH, what members of society consider harmful in this context, and possibly to establish community standards on harmful content that are sensitive to local culture and social norms.
6. If a publicly-available repository were to be developed, it would close the information gap by providing both a big picture perspective and a more granular understanding of the landscape, thereby helping to shape the relevant regulatory and social-support frameworks. There is thus room for more systematic data collection mechanisms, landscape studies and deep-dive research, leading to more targeted and evidence-backed interventions.
7. Existing support centres focus largely on sexual or physical assaults (*e.g.* Singapore Police Force (“SPF”)’s One-Stop Abuse Forensic Examination Centre (OneSAFE Centre) and AWARE’s Sexual Assault Care Centre), domestic violence (e.g. the National Anti-Violence Helpline) and suicide prevention (*e.g.* Samaritans of Singapore Hotline). Operationally, there is presently no organisation that focusses primarily on online harms/GBOH in Singapore, leaving victims with a lack of knowledge on where to seek recourse or assistance in the unfortunate event that they fall victim to such harms. There is thus room for a one-stop support centre that provides holistic support and resources specific to online harms, particularly girls and women experiencing GBOH.

## B. SHE’s role: Building on and complementing existing efforts

1. SHE is committed to complementing the Governments’ efforts and supporting society’s needs by addressing the areas of opportunity above. It does this by **setting up SHECARES@SCWO - Singapore’s first gender-based online harms support centre, and contributing to a publicly-available repository of knowledge in the online harms/GBOH space**
2. SHE will collaborate with the Singapore Council of Women’s Organisations (“SCWO”) to launch the centre around the end of 2022. The centre will work with partners and volunteers to provide the following range of services:
3. A telephone helpline and text-line manned by counsellors;
4. Counselling services for victims by trained counsellors;

1. Pro bono legal assistance for victims, including filing of police reports and/or filing of reports/takedown requests with social media platforms; and
2. Public engagement and education programmes, including in partnership with stakeholders such as the social media platforms, SPF and the Law Society Pro Bono Services (“LSPBS”).
3. Further, SHE aims to develop rich local and comparative perspectives on various aspects of online harms, by embarking on a landscape study to understand, among others, how online harms/GBOH are defined, the profiles of victims and perpetrators, forms of effective interventions, and possible implications on legal frameworks and policies.
4. **Partnerships are key to transformative change**
5. SHE believes that a strong public-private-people collaboration (resulting in a whole-of-society effort) is needed in order to effect the necessary changes. To this end, SHE is engaging partners from the public sector, private sector and people sector in relation to the above:
   * 1. Public sector partners include but not limited to Ministry of Law (“MinLaw”), Ministry of Social and Family Development (“MSF”), and MCI; and a ground partnership with Ministry of Home Affairs/Singapore Police Force (“MHA/SPF”) to improve the reporting experience of the victims;
     2. Private sector partners include internet platforms such as Google, Meta, LinkedIn, TikTok, Twitter and Snapchat, to streamline the reporting process for harmful content; including via platforms’ own in-app reporting systems. The reporting process is a crucial first step to seeking recourse, the outcome of which may include the removal of assessed harmful content, or the suspension or blocking of a user account; and
     3. People sector partners include the SCWO, where the centre will be located, and LSPBS, which will provide pro bono legal support to those who have experienced online harms/GBOH.
6. **Pilot befriender programme**
7. A whole-of-society effort also includes a strong protective network of social support. Based on preliminary feedback from both the ground and the Government, SHE will look to pilot a programme to provide peer-level support to victims of online harms/GBOH. Befrienders will be trained to identify online harms/GBOH warning signs that might be displayed by those in their communities or institutions (such as schools and workplaces). It is hoped that this will increase the rate of help-seeking behaviour among victims, who might be reluctant to approach parents or parental figures.

## C. Anticipated impact

1. Through SHECARES@SCWO and the range of public education and research outlined above, SHE strives to work in partnership with the Singapore government and other stakeholder groups to narrow the definitional, legislative and operational gaps pertaining to online harms/GBOH. SHE commits to ensure appropriate and accessible interventions and support to girls and women from all walks of life, to tackle this emerging scourge in Singapore.

1. <https://www.mci.gov.sg/pressroom/news-and-stories/pressroom/2022/3/sunlight-afa-releases-topline-findings-from-poll-on-online-harms-at-webinar> [↑](#footnote-ref-1)
2. Sunlight AfA Report 2022 <https://www.mci.gov.sg/-/media/MciCorp/Doc/MCI-Sunlight-Report-FA.ashx> [↑](#footnote-ref-2)
3. Ibid [↑](#footnote-ref-3)
4. Sunlight AfA engagements, unpublished report [↑](#footnote-ref-4)
5. Ibid [↑](#footnote-ref-5)
6. Ipsos. (2022, 07 March). *Singaporeans' attitudes towards gender equality, feminism and online behaviour* [Press release]. <https://www.ipsos.com/en-sg/singaporeans-attitudes-towards-gender-equality-feminism-and-online-behaviour>. This is part of a global study carried out in Singapore and 29 other countries, by Ipsos in collaboration with the Global Institute for Women’s Leadership at King’s College London  [↑](#footnote-ref-6)