

Protection of Victims of Digital Sexual Violence: A Comparative Study of Indonesia and South Korea

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Abstract

The development of digital technology has given rise to a new form of violence in the form of digital sexual violence, including deepfake pornography which has not been fully accommodated in the Indonesian legal system. This study aims to compare legal protection for victims of digital sexual violence in Indonesia and South Korea and to formulate strategies for strengthening regulations in Indonesia. The method used normative legal research, with a legislative, conceptual, case, and comparative approach, analyzing regulations and legal practices in both countries. The results show that Indonesia already has a legal basis through the TPKS Law, the ITE Law, and the Criminal Code, but does not yet specifically regulate forms of AI-Based DBV such as deepfake pornography. Implementation challenges include digital evidence, inter-agency coordination, and mechanisms for content removal. In contrast, South Korea has more responsive regulations, supported by specialized agencies focused on victim protection and recovery. The novelty of this research lies in its comparative analysis that focuses on institutional strengthening and technical mechanisms for handling digital sexual violence as concrete recommendations for legal reform in Indonesia.

Keywords

Legal Protection; Digital Sexual Violence; Deepfake Pornography; Indonesia; South Korea

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1. INTRODUCTION

The development of information and communication technology in Indonesia in the digital era has brought significant changes to social interaction patterns. However, this digital transformation has also created new opportunities for digital sexual violence, which has yet to receive an adequate legal response (Diputra, 2024; Rachmaria & Susanto, 2024). Digital-based sexual violence is defined as acts of sexual harassment or exploitation that are committed, facilitated, and/or disseminated through digital media (Puspita et al., 2025). This phenomenon poses a serious threat to digital security, especially for women who are vulnerable to exploitation and the dissemination of intimate content without their consent.



Data from the National Commission on Violence Against Women shows that in 2024, there were 1.791 cases of sexual violence against women, an increase of 40.8% compared to the previous year (Komnas, 2025a). Meanwhile, the Southeast Asian Freedom of Expression Network (SAFE-net) report for the period April-June 2025 recorded 665 cases in Indonesia, with 436 complaints (65.56%) coming from women, and the majority of complainants aged 18-25 years (61.8%) (Ridwan, 2025). The most commonly reported from digital sexual violence include revenge porn, sextortion, cyber harassment, and cyber stalking (Pratiwi, 2024). This condition is in line with the UN Women report, which states that one in three women in the Asia-Pacific region has experienced sexual violence (Aura, 2024; Istiqomah, 2024)—indicating that digital sexual violence is a global issue that requires a swift, adaptive, and victim-oriented legal response.

One rapidly growing form of digital sexual violence is deepfake pornography, which is the manipulation of sexually explicit images or videos using Artificial Intelligence (AI) without the victim's consent (Prayoga & Tuasikal, 2025). A report by Deeptrace Labs (2020) shows that around 96% of deepfake content on the internet is non-consensual pornography, and the amount doubles every six months (Nelson & Simek, 2020). The impact not only threatens privacy but also causes psychological trauma, damage to reputation, and online bullying (Antika, 2020; Rama et al., 2023). The cases at Udaya University involving the use of AI to create fake pornographic content from photos of victims show that the misuse of digital technology has reached an alarming level. (Imam, 2025)

At the international level, South Korea is one of the countries with the highest rates of digital sexual violence in East Asia (Politton, 2024). A 2024 report by the Ministry of Gender Equality and Family (MOGEF) recorded more than 15.000 cases of digital sexual crimes with a significant increase in the distribution of intimate images without consent (Viola & Voto, 2023). The Korean police had arrested more than 3,000 perpetrators by November 2024, and in October 2025, the National Police Agency (NPA) identified 3.411 cases (35.2%) of which were deepfake pornography (Gökmen, 2025). The South Korean government responded by revising the Act on Special Cases Concerning the Punishment of Sexual Crimes to expand criminal provisions to include the production and distribution of deepfake pornography (Martin & Kim, 2024). Throughout 2024, internet service providers in South Korea have removed or blocked approximately 180.000 pieces of illegal sexual content and handled 231.261 reports to protect victims. (Ki-hyeok, 2025)

Several studies show that the main obstacles in handling digital sexual violence in Indonesia lie in the weak digital evidence system, overlapping regulations, and lack of coordination and policy implementation (Diputra, 2024; Zaltina & Nurtjahyo, 2024). In addition, the legal approach in Indonesia still tends to be offender-centered, so that the psychological and social recovery of victims is not yet a top priority. (Faizah & Hariri, 2022)

On the other hand, South Korea shows a more comprehensive approach through a combination of legal, social, and technological policies that are adaptive to digital developments (Ki-hyeok, 2025; TrendTider, 2025). However, comparative studies that specifically compare the legal protection systems for victims of CSBM between Indonesia and South Korea, especially in the context of AI-based deepfake pornography, are still limited. In addition, there has been little systematic research on formulating strategies to strengthen Indonesian regulations using South Korean practices as a normative and institutional learning model.

Theoretically, this study draws on the Legal Protection Theory proposed by Philipus M. Hadjon (1987), which emphasizes the preventive and repressive functions of legal protection in ensuring justice for victims (Asih & Prawitasari, 2025; Hukum Online, 2022b). In practical terms, this research is expected to contribute to the development of criminal law policies that are more adaptive to developments in digital technology, as well as to strengthen a victim-centered approach in efforts to protect victims of digital sexual violence.

This study aims to analyze the comparison of legal protection regulations for victims of sexual abuse in Indonesia and South Korea. In addition, this study also aims to identify the strengths and weaknesses of each legal system in providing preventive and repressive protection. Furthermore, this study seeks to formulate strategies to strengthen legal protection regulations for victims of sexual abuse in Indonesia by learning from the South Korean legal system.

2. METHOD

This study employs a normative legal method to describe the legal norms that govern the legal system, thereby achieving legal certainty (David Tan, 2021). This method was chosen for its comparative nature, which enables it to provide a comprehensive picture of the legal systems under study (Disemadi, 2022). The selection of South Korea as a comparative country is based on several criteria: (1) the existence of progressive regulatory developments in dealing with digital-based sexual violence; (2) South Korea's empirical experience in handling large-scale digital sexual crime cases that have prompted legal reform; and (3) similarities in character as countries with high levels of technology penetration and digital media use, making them relevant for comparison with Indonesia in the context of protecting victims of CSBD.

The analytical approaches used include the statutory, conceptual, case, and comparative approaches. The comparative approach is conducted using a functional comparative method, which compares how each legal system regulates and resolves similar issues, particularly in terms of preventive and repressive protection for victims of digital sexual violence.

Descriptive qualitative analysis was conducted by establishing indicators or measurement variables that included: (1) the definition and scope of KSBD; (2) forms of preventive protection (e.g., state obligations, oversight mechanisms, and digital education); (3) forms of repressive protection (criminal sanctions, law enforcement mechanisms, and victim recovery); (4) restitution and recovery mechanisms; and (5) victim-centered approaches in the judicial process. Through these indicators, the study examines the similarities and differences in legal norms, then assesses the strengths and weaknesses of each system to recommend legal reforms in Indonesia.

The data sources used are secondary data consisting of primary, secondary, and tertiary legal materials. Primary legal materials include various regulations, namely Law No. 12 of 2022 concerning Sexual Violence Crimes, Law No. 11 of 2008 concerning Electronic Information and Transactions in conjunction with Law No. 19 of 2016, Law No. 1 of 2023 concerning the Criminal Code, Act on Special Cases Concerning the Punishment of Sexual Crimes (2022 revision) and Act on the Prevention of Sexual Violence and Protection of Victims (2025 revision), which are provisions in the Criminal Act (South Korean Criminal Code).

3. FINDINGS AND DISCUSSION

3.1. Comparison of Legal Protection Regulations for Victims of Digital Sexual Violence in Indonesia and South Korea

The development of digital technology has significantly changed the patterns of communication, social interaction, and self-expression. Behind these benefits, the digital space also presents a new form of violence, namely digital sexual violence (Fikriya et al., 2023). Unlike conventional sexual violence, digital sexual violence is perpetrated through digital media such as social media, instant messaging apps, and various online platforms, enabling the rapid, widespread, and difficult-to-control dissemination of its content. These characteristics result in more complex and long-lasting impacts on victims.

Contextually, digital sexual violence is an act committed without the victim's consent to realize, exploit, intimidate, or humiliate the victim through digital means (Rendanianti, 2024). Thus, it not only violates moral norms but also the rights to privacy, dignity, and security. This complexity shows that this violence is a form of human rights violation that has developed alongside technological advances.

The borderless nature of cyberspace and the persistence of digital traces make it difficult to achieve the impact of digital sexual violence fully. Content that has been disseminated can continue to be replicated and redistributed, causing victims to experience revictimization and prolonged trauma (Saputra et al., 2024). Data from the National Commission on Violence Against Women shows that online gender-based sexual violence still occurs significantly in reports of violence against women in

the period 2022–2024 (Aprilia, 2024; Fazny et al., 2024; Hikmah, 2024; Patricia Samosir, 2023; Rohman, 2025). This situation indicates that existing regulations are not yet fully effective in reducing incidents or protecting victims.

3.2. Regulations on Legal Protection for Victims of Digital Sexual Violence in Indonesia

Legal protection for victims of digital sexual violence in Indonesia has gained a more comprehensive normative basis through Law Number 12 of 2022 concerning Criminal Acts of Sexual Violence (TPKS Law). The presence of the TPKS Law marks a shift in the national criminal law paradigm from an offender-oriented approach to a victim-oriented approach. Article 4 letter d of the UU TPKS emphasizes that sexual violence includes non-physical acts, including electronic-based actions carried out without the victim's consent. Furthermore, Articles 14 and 15 of the UU TPKS specifically regulate electronic-based sexual violence, including the coercion to create and/or disseminate sexual content. Articles 66–67 regulate the state's responsibility in fulfilling the rights of victims, while Articles 68–75 regulate the rights of victims, such as the right to information, protection from intimidation, legal assistance, medical and psychological recovery, and the removal of sexual content distributed without the victim's consent. (Sistha et al., 2025)

These provisions indicate a strengthening of the recovery and restitution dimension for victims within the national legal system. However, the TPKS Law does not explicitly regulate the phenomenon of deepfake pornography as a specific form of KSBD. This normative gap poses interpretative challenges, particularly in determining the construction of offenses, proving intent, and criminal liability in cases of artificial intelligence-based content manipulation. Prior to the enactment of the TPKS Law, the regulation of digital sexual violence was scattered across several legal instruments, including Law Number 1 of 2024 concerning the Second Amendment to Law Number 11 of 2008 concerning Electronic Information and Transactions (ITE Law), Law Number 1 of 2023 concerning the Criminal Code (KUHP), and Law Number 31 of 2014 concerning Witness and Victim Protection.

In the ITE Law, Article 27 paragraph (1) regulates the prohibition of distributing content that violates decency, Article 29 regulates the sending of threats of violence, Articles 30–32 regulate unauthorized access and manipulation of data, and Article 36 regulates acts that cause losses due to the misuse of electronic information. In contrast, Article 45 contains provisions on criminal sanctions. On the other hand, the new Criminal Code, through Articles 413–417, regulates non-physical sexual harassment, including that committed through electronic means. Although various legal bases are available, the regulatory approach remains fragmented and emphasizes technological violations rather than comprehensive protection for victims. Regulations scattered across various laws have implications

for overlapping norms, inconsistent application of articles, and difficulties in proving cases in judicial practice.

Empirically, the National Commission on Violence Against Women (Komnas Perempuan) report shows a significant increase in gender-based violence in the digital realm, including digital sexual violence (Komnas, 2025). However, this increase has not been matched by effective law enforcement. The implementation of the TPKS Law still faces structural obstacles, including limited capacity of officials in digital forensics, weak inter-agency coordination, and low reporting rates due to social stigma and legal uncertainty. (Rohman, 2025)

Juridically, Indonesia's lag in responding to phenomena such as deepfake pornography can be analyzed through three aspects. First, a reactive legislative approach that is not yet based on anticipating developments in artificial intelligence technology. Second, the suboptimal harmonization between substantive criminal law and criminal procedure law in the context of digital evidence. Third, there are no specific regulations regarding digital platforms' responsibilities as intermediaries to prevent and promptly remove illegal content (effective notice-and-takedown mechanisms).

The government has sought to strengthen coordination through Government Regulation No. 27 of 2024 on Coordination and Monitoring of the Prevention and Handling of Sexual Violence Crimes. However, the effectiveness of this regulation still depends heavily on institutional capacity, the integration of digital law enforcement systems, and the political will to expand corporate and digital platform provider accountability. Thus, although the normative framework for protecting victims of sexual violence has made significant progress through the TPKS Law, the main challenges lie in harmonizing regulations, strengthening law enforcement capacity, and updating laws to adapt to developments in artificial intelligence-based technology. Without such updates, legal protection risks being symbolic and failing to guarantee substantive justice for victims fully.

3.3. Legal Protection Regulations for Victims of Sexual Violence in South Korea

South Korea is one of the countries in East Asia that has responded progressively to the development of digital sexual crimes, including the distribution of non-consensual intimate images, the use of hidden cameras (molka), and deepfake pornography (Kamal, 2024). The increase in these crimes has prompted the establishment of a comprehensive legal framework through the Criminal Act and the Act on Special Cases Concerning the Punishment of Sexual Crimes (ASCPSC), which serves as *lex specialis*.

In South Korea's Criminal Act, provisions regarding sexual violence are regulated in Articles 297–301, which cover rape and indecent acts with violence or threats. Meanwhile, more specific regulations on digital sexual crimes are stipulated in the ASCPSC. Article 14 of the ASCPSC explicitly prohibits the recording of a person's body without consent for sexual purposes using digital devices. Article 14-2

regulates the prohibition of the distribution, reproduction, or transmission of sexual content without the victim's consent, including through online media. These provisions are expanded in Article 14-3, which criminalizes the possession or consumption of non-consensual sexual content. Further reforms after 2020 added Article 14-5, which explicitly regulates the production and distribution of deepfake pornography without consent.

South Korea's legal approach does not stop at criminalization; it also prioritizes victim protection as an integral part of the judicial system. Articles 20–22 of the ASCPSC prohibit the disclosure of victims' identities. In addition, victims have the right to request the removal of content through an administrative mechanism in collaboration with the Korea Communications Standards Commission (KCSC). Procedurally, Articles 30–31 regulate victim-friendly examinations by providing special rooms, psychological counselors, and examiners with a gender-sensitive perspective. (Lee, 2024)

The momentum for legal reform was accelerated by cases in South Korea that revealed the limitations of previous regulations in addressing encryption-based technologies and digital anonymity. The state's response was not only in the form of revising criminal norms, but also institutional strengthening through the establishment of the Digital Sexual Crime Victim Support Center (DSCVSC) under the Ministry of Gender Equality and Family (MOGEF), which provides legal assistance, psychological counseling, and digital content removal services. (Jun-hee, 2024)

South Korea is often categorized as a “state-led digital governance” approach in tackling technology-based sexual violence, which shows that specific criminalization of spycams and the distribution of non-consensual content significantly increases reporting and speeds up law enforcement responses. Other research confirms that explicit regulations on image-based sexual abuse are more effective than the use of general defamation or indecency provisions (McGlynn et al., 2017). This approach highlights the importance of legal clarity and explicit recognition of digital sexual violence as a consent-based offense.

Critically, South Korea's progress has been driven by three main factors: (1) strong social pressure in the wake of high-profile cases; (2) legal recognition that digital sexual violence is a violation of human rights and dignity; and (3) integration between criminal regulations and administrative policies on content removal. The state positions itself not only as a punisher, but also as an active protector through legally binding obligations on authorities and digital platforms.

Compared to Indonesia, there is a normative and implementation gap. Indonesia does have Law No. 12 of 2022 on Sexual Violence Crimes (TPKS Law), which regulates electronic-based sexual violence. However, prior to the TPKS Law, cases were handled under the Electronic Information and Transactions Law (ITE Law), which is oriented toward decency or content distribution rather than violations of the victim's consent. The fundamental difference lies in the way the offense is constructed.

South Korea has, from the outset, established norms based on victim protection (victim-centered approach), while Indonesia has only recently shifted to this paradigm explicitly through the TPKS Law.

Thus, South Korea's advantage lies not only in the severity of its sanctions but also in the certainty of its norms, its rapid response to technological developments, and its legal enforcement, which ensure the state provides concrete mechanisms for victim recovery. This model shows that the effectiveness of legal protection for victims of digital sexual violence requires a combination of specific criminalization, procedural reform, and integrated institutional support.

3.4. Comparison of Legal Protection Regulations for Victims of Sexual Violence

The development of regulations on digital sexual violence in Indonesia and South Korea shows differences in normative, institutional, and implementation effectiveness aspects. Conceptually, both countries have adopted a victim-centered approach to justice. However, the level of regulatory readiness and legal enforcement power differs substantially. In Indonesia, Law No. 12 of 2022 on Criminal Acts of Sexual Violence (TPKS Law) marks a normative advancement by recognizing that sexual violence can occur without physical contact in Article 4 letter (d). This provision is reinforced by Articles 68–75, which regulate the victim's rights to protection, recovery, and the removal of digital content circulating without consent. In addition, regulations related to electronic information are also related to Law Number 1 of 2024 concerning the Second Amendment to the ITE Law and the Criminal Code. (Law No. 1 of 2023)

However, in terms of implementation, it has not fully addressed the technical issues of evidence and the removal of digital traces. The main challenges lie in the limited capacity of digital forensics, the lack of coordination between agencies, and the uneven level of legal literacy among law enforcement officials. This situation indicates that, although the norms are progressive, their legal enforceability is not yet optimal because they lack adequate technical instruments and enforcement infrastructure.

In contrast, South Korea regulates violence in Articles 297–305 of the Criminal Act on Sexual Crimes, as well as more specifically through the Act on Special Cases Concerning the Punishment of Sexual Crimes (ASCPSC) as *lex specialis*. Article 14 of the ASCPSC prohibits taking pictures without consent, Articles 14-2 and 14-3 regulate the distribution and possession of illegal material, and Article 14-5 explicitly criminalizes the production of manipulative content such as deepfake pornography. With this scope, South Korean law regulates the entire chain of crime from production and distribution to consumption in a systematic and integrated manner.

Table 1. Comparison of sexual violence in Indonesia and South Korea

Aspect	Indonesia	South Korea
Legal Basis	Law No.12/2022 (TPKS), Law No.1/2024 (UU ITE), Law 1/2023 (Criminal Code)	Criminal Offenses Articles 297–305 and ASCPSC
Digital Coverage	Article 4 letter (d) of the TPKS Law	Articles 14–14-5 of the ASCPSC
Institutional Model	Multi-institutional, coordinative	Integrated (DSCVSC–MOGEF–KCSC)
Approach	Victim-centered norms	Operational-centered
Effectiveness	Limited to implementation capacity	High and systemic

Source: Author

From an institutional perspective, Indonesia relies on the Ministry of Women's Empowerment and Child Protection (KemenPPPA), the Witness and Victim Protection Agency (LPSK), and the Police's Women and Children Protection Unit (PPA Polri). However, coordination and integration of digital systems between institutions remain sectoral. In contrast, South Korea has a Digital Sexual Crime Victim Support Center (DSCVSC) under the Ministry of Gender Equality and Family (MOGEF) that works closely with the Korea Communications Standards Commission (KCSC). This model enables a rapid response to content removal, victim assistance, and digital forensic support within a single institutional ecosystem.

The large number of cases became a turning point for legal reform in South Korea. The government revised the law to impose heavier penalties, expand the definition of perpetrators to include consumers of illegal content, and accelerate the digital deletion mechanism. The reform demonstrated strong legal coercion, namely public pressure that was translated into responsive legislation and progressive law enforcement. Meanwhile, Indonesia still faces structural challenges, including a legal culture that is not yet fully victim-oriented, low reporting rates, and difficulties proving cases due to the criminal procedure law's electronic evidence standards that are not yet adaptable to the nature of cybercrime.

3.5. Strengthening Regulations on Legal Protection for Victims of Digital Sexual Violence Based on Lessons Learned from South Korea

The theory of legal protection proposed by Philipus M. Hadjon (1987) forms the basis for the main concept in analyzing the form and effectiveness of legal protection for victims of digital sexual violence in Indonesia. Hadjon defines legal protection as all forms of efforts that guarantee the recognition,

respect, and provision of human rights through preventive and repressive mechanisms. Preventive legal protection aims to prevent violations through regulation and supervision, while repressive legal protection seeks to restore victims' rights through law enforcement and recovery mechanisms. (Hukum Online, 2022)

In the context of digital sexual violence, this approach is relevant because the impact is not only material but also immaterial, such as psychological trauma, social stigma, and permanent damage to reputation due to digital traces (Panggabean et al., 2024). Cyber law literature shows that the main characteristics of digital sexual violence include the anonymity of the perpetrator, the speed of content distribution, and unlimited replication, which cause a greater impact than conventional violence (McGlynn & Rackley, 2017). Thus, the legal protection approach cannot solely rely on a repressive paradigm.

Normatively, Indonesia has passed Law Number 12 of 2022 concerning Criminal Acts of Sexual Violence (TPKS Law), which recognizes forms of technology-based sexual violence. However, the implementation of protection for victims of digital sexual violence is still partial. Several studies show that the main obstacles lie in the lack of rapid content preservation facilities, limited technical guidelines for law enforcement officials, and the lack of integration of psychological recovery and legal aid services (Dewi et al., 2025). This condition shows that the preventive and repressive functions are not yet balanced as conceptualized by Hadjon. Based on Hadjon's theoretical construct, effective legal protection must fulfill three main dimensions:

- a. Normative dimension: clarity of the formulation of offenses, legal certainty, and harmonization of cross-sector regulations (criminal, data protection, and cyber);
- b. Institutional dimension: the establishment or strengthening of special institutions for victim protection with coordinative and executive authority;
- c. Implementation dimension: clear standard operating procedures (SOPs), rapid response systems, and the integration of legal, psychological, and digital forensic services.

In practice, this third dimension has not been optimally integrated in Indonesia. Law enforcement officials still face difficulties in digital evidence and the interpretation of technology-based criminal elements due to the lack of integrated technical guidelines. This has resulted in suboptimal access to justice for victims. In comparison, South Korea has demonstrated a more systematic model of legal protection in dealing with digital sexual violence. The country has established a Digital Sex Crime Victim Support Center, a special agency with the authority to proactively remove illegal content, provide legal assistance, and facilitate integrated psychological recovery (Jang & Suh, 2024). In addition, regulations in South Korea require digital platforms to collaborate on content removal and perpetrator tracking. This approach reflects a balance between preventive (monitoring and rapid removal) and

repressive (prosecution and victim recovery) aspects.

Table 2. Recommended Implementation Framework for Indonesia

<p>Phase I – Regulatory Strengthening (Normative)</p>	<ul style="list-style-type: none"> • Drafting of Government Regulations or Implementing Regulations of the TPKS Law that specifically regulate the mechanism for removing content within a certain time limit (e.g., 24 hours); • Harmonization with the ITE Law and Personal Data Protection Law to ensure legal certainty; • Formulation of technical guidelines on digital evidence for law enforcement officials.
<p>Phase II – Establishment of a Special Agency Model (Institutional)</p>	<ul style="list-style-type: none"> • Establishment of a Center for the Protection of Victims of Digital Sexual Violence under the coordination of the Ministry of Women's Empowerment and Child Protection or an independent agency; • The institution's authority includes: content removal, coordination with digital platforms, legal assistance, and psychological recovery. • A one-stop integrated digital-based service system for reporting and assisting victims.
<p>Phase III – Implementation and Evaluation (Operational)</p>	<ul style="list-style-type: none"> • Development of integrated SOPs between the police, prosecutors, courts, and victim service agencies; • Training of law enforcement officials on digital forensics and gender perspectives;

	<ul style="list-style-type: none">• Monitoring and evaluation based on performance indicators (speed of handling, victim recovery rate, and effectiveness of content removal).
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Source: Author

This shows that legal protection should not be merely declarative but must be institutionalized in operational structures and procedures, by expanding the scope of Hadjon's legal protection theory into the context of digital sexual violence, which has its own unique complexities, such as the anonymity of perpetrators and the permanence of digital traces. Its theoretical contribution lies in the reinterpretation of the preventive and repressive dimensions in cyberspace, where prevention requires technological intervention and cross-sector collaboration. At the same time, victim recovery demands a multidisciplinary approach (law, psychology, and information technology).

Thus, Hadjon's legal protection theory remains relevant and applicable in the context of digital sexual violence, but requires actualization through regulatory updates, institutional strengthening, and measurable implementation schemes. Lessons from South Korea show that effective legal protection requires the state's active, responsive presence in protecting the dignity and integrity of humans as subjects of law in the digital age.

4. CONCLUSION

This study confirms that although Indonesia and South Korea both adopt a victim-centered justice approach in their criminal justice systems related to digital sexual violence, there are fundamental differences in the level of regulatory adaptability and institutional effectiveness. Indonesia already has a normative foundation through Law Number 12 of 2022 concerning Criminal Acts of Sexual Violence, Law Number 11 of 2008 concerning Electronic Information and Transactions, as amended by Law Number 19 of 2016, and Law Number 1 of 2023 concerning the Criminal Code. However, this framework is not yet fully responsive to new developments, such as deepfake pornography, and its implementation still faces structural and technical obstacles.

In contrast, South Korea demonstrates a more adaptive and integrated regulatory model through the Act on Special Cases Concerning the Punishment of Sexual Crimes (revised in 2022) and the Act on the Prevention of Sexual Violence and Protection of Victims. This strengthening is supported by the existence of a special institution, the Digital Sexual Crime Victim Support Center (DSCVSC), which provides integrated services ranging from content removal to psychological and legal assistance. This model reflects comprehensive legal protection by integrating preventive, repressive, and rehabilitative dimensions in a balanced manner.

From a policy perspective, Indonesia needs to reformulate its regulations to explicitly accommodate new forms of digital sexual violence, including artificial intelligence-based content manipulation such as deepfakes. In addition, strengthening inter-agency coordination mechanisms, improving the digital literacy of law enforcement officials, and establishing integrated service centers specifically for digital sexual violence victims are strategic steps toward creating a more responsive and preventive protection system. The simultaneous integration of penal and non-penal policies will encourage the transformation of the legal protection system from a partial, reactive system to a comprehensive, victim-oriented one.

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