

## CRIMINALITY OF CHILD EXPOSURE TO ONLINE PONOGRAPHY IN LIBYA: CHALLENGES AND LESSONS FROM AUSTRALIA FOR REFORMS

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### ABSTRACT

As important members of the larger society, Libyan children, like their counterparts in other countries, are being well integrated into the global internet village. Consequently, they live and grow both in the physical and the cyber environments. Realistically, the cyber environment also has its natural threats which it poses to the children. A challenge in this regard is the easy access which the children have to the cyber environment for its unhindered exploration. Consequently, they could either be made or marred morally depending on what they interact with online. Online pornography remains a major online interaction that can easily mar the moral disposition of any child. Although the phenomenon of online pornography and exposure of children to it has risen in the recent past mostly in western countries, it is becoming a global problem with alarming negative consequences on the moral standard of children. The trend has not spared Muslim countries like Libya, where Islamic law demands training children with high moral standards. In 2013, almost a million of porn websites were blocked by the Libyan Ministry of Communication and Information for attracting around 30% to 40% of the Internet users. Surprisingly, the Libyan Penal Code does not yet specifically penalise online pornography generally, and exposure of children to it particularly, but rather generally punishes "Indecent acts" as proscribed in Article 421 of Libyan Penal Code 1953 whose definition may however hardly cover online pornography and exposure of children to it. Hence, the need for some legal reforms in this regard. Methodologically, this study is accomplished through the doctrinal legal research approach, involving essentially context analysis of the relevant statutes and materials. In addition, to achieve better findings, the comparative law method of Horizontal comparison approach has equally been employed. While specifically drawing lessons from the Australian Crimes Act to effect necessary legal reforms in the Libyan Penal Code, this study reveals the importance of regulating cyberspace by law to make the online environment for safe for the children across the globe. This therefore makes the findings from this study globally relevant for countries that desire safe e-environment for their children.

*Key Words:* Child; Online-Pornography; Libya; Australia; Legal Reforms

### 1. INTRODUCTION

Seeking lawful means of livelihood is arguably desirable, but in Islam, it is mandatory for Muslims to seek their livelihood from lawful means.<sup>1</sup> This should not be surprising because Allah is pure (*tayyib*) and does not accept anything, but what is pure. Muslims earnings are meant to move them closer to Allah. Thus, Islam directs all human beings to make their livings from lawful occupations.<sup>2</sup> In the past two decades, doing online businesses has become very common and productive income earnings outlets. One of these businesses is establishing websites of pornographic materials. This business is being seen in some quarters as a kind of art and it includes such products as sexual adult videos, obscene photos either for adults or children or for advertisement. Unfortunately, this kind of business has spread globally even up to Muslim countries and amongst young Muslims. This calls for growing concerns on whether earnings gotten from porn websites are lawful or not. There is need for precise clarity on the positions of the Quran, the Sunnah and Muslim scholars' opinions on porn websites. Importantly, Muslims involved in this kind of business requires some attractions to be encouraged to abandon this kind of business. To do this, such Muslims should be exposed to more beneficial and lawful means of earnings safeguarded in Islamic law.

Notably, some countries have taken actions through the law against such websites and banned the pornography businesses such as the United Arab Emirates. Yet many other countries have given permission to porn websites makers to trade their products especially with adults' porn materials and only to adults as done in the United Kingdom and United States of America and many others. As important members of the larger society, Libyan children, like their counterparts in other countries, are being well integrated into the global internet village. Consequently, they live and grow both in the physical and the cyber environments. Realistically, the cyber environment also has its natural threats which it poses to the children. A challenge in this regard is the easy access which the children have to the cyber environment for its unhindered exploration. Consequently, they could either be made or marred morally depending on what they interact with online. Online pornography remains a major online interaction that can easily mar the moral disposition of any child. So, this study aims to highlight the danger of children exposure to online porn materials through different fields of literature reviews.

The exposure of children to online porn is becoming a global problem with alarming negative consequences on the moral standard of children. The trend has not spared Muslim countries like Libya, where Islamic law demands training children with

<sup>1</sup> This is inherent in the Islamic concept of *Al-Halal and Al-Haram*, i.e. the lawful and the prohibited.

<sup>2</sup> In this regard, the Quran declares: "O Mankind eat from whatever is on earth that is lawful and good, and do not follow the footsteps of Satan". See Quran 2 (Surah Al-Baqarah): 168.



Moreover, porn websites makers have created “premium content” which includes HD videos, without ad/pop-up promises, unlimited downloads, online Live Cam streaming, and so on. Among other services, the user can ask the website to deliver content of the porn to own emails, or real homes address. By these several service strategies and options, porn websites makers make their businesses more convenient and attractive.<sup>9</sup> As a sort of business strategy, they advertise through provision of subscriptions to priority access to the most modern and the newest content from favorite 'star' that may take months to spread into the free Internet. Another way is to attract customers by providing personalized sex toys that present the event of being with your desired star. Also provided are chat rooms dating sites for adults. These are remarkable facilities which millions sign up for. It is indeed a great moneymaking business lucrative enough to be attractive to anyone.

Also, these websites offer different helpful systems of payment options ranging from as daily, weekly, monthly, quarterly and even yearly. Like the common newspaper/magazine subscriptions, the longer the subscription, the more discounts to get and the more the brand devotion rises. These subscriptions cost something from \$1-15 a day. Despite this high cost, millions still sign up for it.

While a website may earn primarily from subscriptions, it also cashes on man's primitive lust for flesh through cooperation between “Similar Services” providers. The website thus makes money off traffic from other similar websites which it redirects. That explains why there are always porn *ads* on sites which are not porn sites. The “Similar Services” refers to adult dating sites, online adult stores, enhancement drug stores, and adult gaming sites. This forms an intricate and complex nexus of websites, all making money off each other, and cashing on man's instincts and he is made to contribute to funding the “free mini clips” being seen here and there.

To give a sense of the traffic, Xvideos, the world's biggest porn site, enjoys 4.4 billion page views and 350 million unique visits every month. If Google data is anything to go by, the other four of the top five porn sites combined enjoy more traffic than Wikipedia. 3D porn has also made a red-carpet debut onto the global porn arena. With TV companies going bonkers over their latest 3D TVs and Smart LED screens, some of the more mature porn markets are ready to pay for 3D porn that will give man the sense of pleasure. Ironically, even though this transaction leaves many poorer by around \$10 or more, there are still people queuing up to pay. Porn sites therefore have the foreboding that DVD sales would wane, and have also rolled out “video on demand” services to adapt to the transforming user-base.

In the US, UK, Australia and many other places, special events are held for people to meet their favourite porn stars, click a selfie, and if a man is polite and nice, he may even get to touch a body part. Passes to these shows are of course not free. There are also porn award programmes and the TV viewership they garner. Last but not the least, there are major hotel chains like Marriott, Hilton and Westin to name a few. These bring serious money to the industry without ever a mention of the same in their official reports. Adult titles are available across the world as “in-room entertainment” in most countries around the globe and a fair share of the money hotel guests pay goes to the studios. When one considers how this reaches across genres and the millions of independent artists who run their own websites, one might get an idea of how big this business is. The Islamic position on the issue cannot therefore be jettisoned.

### 3. ISLAMIC LEGAL POSITION ON PORN

It is well known from many verses of the Qur'an and Sunnah,<sup>10</sup> that Islamic law encourage Muslims to engage in chaste and pure work. Hence, selling or renting pornographic materials are prohibited and unlawful under Islamic Law. It is against “modesty” and “chastity” which are a fundamental Islamic rule guiding communication and interaction between individuals, both in private and in public. On the authority of Abu Dharr (RA), it is reported that some people from amongst the Companions of the Messenger of Allah (SAW) said to him, “O Messenger of Allah, the affluent have made off with the rewards; they pray as we pray, they fast as we fast, and they give [much] in charity by virtue of their wealth.” He (SAW) said, “Has not Allah made things for you to give in charity? Truly every *tasbeehah* [saying: 'subhan-Allah'] is a charity, and every *takbeerah* [saying: *Allahu akbar*] is a charity, and every *tahmeedah* [saying: 'al-hamdu lillah'] is a charity, and every *tahleelah* [saying: 'laa ilaha illal Allah'] is a charity. And commanding the good is a charity, and forbidding an evil is a charity, and in the *bud'i* [sexual act] of each one of you [with his legal partner], there is a charity.” They said, “O Messenger of Allah, when one of us fulfils his carnal desire, will he have some rewards for that?” He (SAW) said, “Do you not see that if he were to act upon it [his desire] in an unlawful manner, then he would be deserving of punishment? Likewise, if he were to act upon it in a lawful manner then he will be deserving of a reward”.<sup>11</sup>

There are some sins and crimes which pornography can lead the Muslim who engages in it unto. It will make him commit fornication through the eyes and expose him to see the private parts of other persons contrary to the modesty prescribed for him to be observed by Islam.

<sup>9</sup> “This is how porn sites make money”, Business Insider India available at [www.business-insider.in/This-is-how-porn-sites-make-money/articleshow/](http://www.business-insider.in/This-is-how-porn-sites-make-money/articleshow/) (accessed on 31st Jan 2016).

<sup>10</sup> Quran and Sunnah are the primary sources of Islamic law. On this see, Engku Ali Interna, 'INTRODUCTION : SOURCES OF ISLAMIC LAW & HISTORICAL DEVELOPMENT OF.'

<sup>11</sup> Reported by Muslim. See [www.Authenticuheed.com/2012](http://www.Authenticuheed.com/2012).(accessed on 2 Feb 2016).

### 3.1 Zina of Parts of the Body:

In several verses of the Quran, Allah warns Muslims that not follow the footsteps and ways of Satan. The rationale behind this is because of the tracks of the Satan: "He will incite you into shameful things (*fuhsa*) and encourage you to do universally acknowledged wrong things (*al-munkar*).<sup>12</sup> It is legally stipulated that Muslims must restrain their gaze and guard their private parts.<sup>13</sup> Many other parts of the body, not only the private parts, can also commit fornication.

Prophet Mohammad (peace and blessings be upon him) is reported to have said that, "the eyes commit adultery, the tongue commits adultery, the hands commit adultery, the feet commit adultery and then the private parts confirm it or deny it".<sup>14</sup> As it is well known, *zina* is a crime under Islamic Law and it simply means an illegal sexual practice between a man and a woman who are unmarried to each other. By English translation however, a married person that engages in *zina* is said to have committed "adultery" and the act when done by an unmarried person, it is called "fornication".<sup>15</sup>

### 3.2 Islamic Description of *Awrah*:

The private part of a man or woman that should not be publicly exposed is called *awrah*. One of the purposes of dressing is to cover the shame (*awrah*) of both male and female. In this regard, the Quran declares: "O ye Children of Adam! We have bestowed garments upon you to cover your shame, as well as to be an adornment to you, but raiment of righteousness is the best".<sup>16</sup> Islamic scholars vary in their positions on whether a man's knee is part of *awrah* that he should cover in public or not. According to Ibn Qudamah in his popular book, *al-Mughni*: "the knees themselves do not have to be covered (they are not part of a man's *awrah*). This is the opinion of the *Jumhur* (majority of the jurists) consisting of Ahmad, Malik and Al-Shafi'i".<sup>17</sup> However, Imam Abu Hanifah posits that knees are part of a man's *awrah*. As for women, the Quran enjoins believing women to restrain their gaze and guard their private parts and additionally not to reveal their adornment except that which is revealed of itself".<sup>18</sup>

Further still, the Quran has instructed the Prophet to tell his wives, daughters and women of the believers to draw their *Jalabib* all over their bodies. Doing so is explained to be better for them and "that they should be known so not to be annoyed. And Allah is ever], most merciful".<sup>19</sup> Similar instructions have also been given in many other verses. All these are to demonstrate the emphasis which is placed on modesty in Islam. Thus, in a sort of comprehensive manner, the Prophet has been further instructed as follows:

And tell the believing woman to lower their gaze, and protect their private parts, and do not show off their adornment except only that which is apparent, and to draw their veils all over body, and not to reveal their adornment except to their husbands, their fathers, their husband's fathers, their sons, their husband's sons, their brothers or their brother's sons, or their sister's sons, or their woman, or the female slaves whom their right hands possess, or old male servants who lack vigour, or small children who have no sense of the shame of sex. And let them not stamp their feet so as to reveal what they hide of their adornment. And beg Allah to forgive you all, O believers, that you may be successful.<sup>20</sup>

There is also an instruction from the Prophet Mohammad (PBUH) that, "no man or woman should look at the naked body of each other (unless married)".<sup>21</sup> Still for the purpose modesty, it is also stipulated in Islam that a Muslim man or woman should not expose his or her thigh to anyone and should not look at the thigh of any other person either s/he is alive or dead, except the person is his/her spouse.<sup>22</sup> Another emphatic instruction from the Prophet also states that, "it is not permissible for a man to be alone with a woman, and no lady should travel except with a *Mahram* (i.e. her husband or a person whom she cannot marry in any case for ever; e.g. her father, brother, etc.)".<sup>23</sup> As a measure against the *zina*, Islam frankly forbids free mixing of males and females and prescribe their segregations where they cannot avoid each other, but meet.<sup>24</sup>

The majority of Muslim scholars (*Jumhur*), such as Imams Abu Hanifah, Malik, Ash-shafi'i and Al-Awza'i, said that what is meant with part of the body granted exception to be exposed by the woman is the face and the hands. They based their opinion on the evidence like the one reported by Imam Abu Dawud on the authority of A'ishah (R.A.) saying: "Asma', the daughter of Abu Bakr, came to the Prophet (S.A.W.) wearing thin clothes. When the Prophet (S.A.W.) saw that, he looked away and said, "Oh Asma', if a woman reaches puberty, she should not show anything from her except this and he pointed to his face and his

<sup>12</sup> Quran 24:21.

<sup>13</sup> Ibid.

<sup>14</sup> Reported by Ahmad Ibn Hanbal. See Abdul Maliak Mujahid, Islam on pornography: A Definition No No. [www.soundvision.com/article/Islam-on-pornography-a-definite-no-no](http://www.soundvision.com/article/Islam-on-pornography-a-definite-no-no). (accessed on 31 Jan 2016)

<sup>15</sup> See Isa Adeniyi Zina: *Islamic Perspective on Adultery and Fornication* (Lagos: Salasabil Assocaites, Second Prints, 2002).

<sup>16</sup> Quran 7:26.

<sup>17</sup> A Muslim man must cover from the navel to the kneel. See Islam Today-English. <http://en.islamtoday.net>. (accessed on 25 Jan 2016).

<sup>18</sup> Quran 24:30-31.

<sup>19</sup> Surah Al-Ahzab (verse 59)

<sup>20</sup> Surah An-Nour (verse 31). See also Islamic Hijab Cover for Muslim Woman. <http://islam1.org/khutub/Hijab.htm> (accessed on 15 Feb 2016).

<sup>21</sup> Sahih Muslim; Abdul Maliak.

<sup>22</sup> Ibid.

<sup>23</sup> Bukhari (52:250)

<sup>24</sup> For a study on this, see Muhammad Iqbal Siddiqi, *Islam Forbids Free Mixing of Men and Women* (nd).

hand". Imam Abu Hanifah added "the feet" to this exception because it is more difficult to cover the feet than the hands, and many of the women of *At-Tab'een* did not cover their feet when they worked in the country.<sup>25</sup> The foregoing has shown that watching private parts of another person, other than that of one's spouse, is forbidden in Islam. The issue that may therefore follow to be clarified is whether earning a livelihood through pornography transactions can enjoy the sanctions of Islamic law as lawful.

#### 4. ISLAMIC LAW PROVISIONS ON LAWFUL AND UNLAWFUL EARNINGS

The Qur'an and the Sunnah, as the primary and most important sources of Islamic law, have obvious evidences on obligation of lawful earnings for Muslims. In surah Al-Baqarah, it is expressly declared thus: "O You who believe, eat from the good things which we have provided for you, and be grateful to Allah if it is indeed him that you worship".<sup>26</sup> In the Sunnah, it clarified that when a person has four things, he needs not be concerned about any other thing he misses out in this life. These have to do with characters and not material things. In this regard, when a man is blessed with "preserving the trust", "saying the truth", "well manners", and "chastity and purity in what he eats",<sup>27</sup> he has no reason to be bothered about other things he could not achieve. This also supports the fact that it is obligatory upon every Muslim man and woman to look for lawful earnings, pure and chaste work and avoid engaging in any unlawful transactions, no matter how highly lucrative it may be.

Lawful earning is so important in the life of the Muslim that for his spending in various good ways to be acceptable, the proceeds must have come from lawful businesses. The issues of *halal* and *haram* must be well guided. "Haram" is originally an Arabic term that describes anything that is prohibited according to the Islamic law. In contrast, the term "Halal" refers to anything that is permitted or lawful to use or engage in it in Islamic Law.<sup>28</sup> Regarding to business, the most important rule for the business for every man and woman is: DO NOT SELL THE HARAM MATERIALS.

Though there are more "Muslim" business men springing up, some of their modern businesses of selling or renting are still not Islamic. Unfortunately, it has become easy to find Muslims engaging in Haram businesses which include selling pork, alcohol, pornographic magazines, and renting out this kind of movies or selling them.<sup>29</sup> In Islamic law, before investing in any business of a company, it is essential for Muslims to compare it with Islamic law to discover where its basic revenue comes from and how its earnings and expenditures are managed. This information is so important to ascertain if the investment or business is *Halal* (lawful) or not. Then, if it is not *halal*, it is *haram* or unlawful.<sup>30</sup>

Islamic scholars have extensively discussed the Islamic rulings (*hukum*) on using unlawful money in spending on self or family or giving it as charity. There are different views which can be summarised. The *Jumhur* of scholars opine that a person who has earned illegal profits must return them to their owners if they are known. He can only use the amount of the unlawful money in spending on himself or his family only if he is poor and needs it. However, Other *ulama* (scholars) posit that this is not allowable, but if a poor person used that money for needed things for him or his family, the money will be as a debt on him and must be returned when he becomes better financially.<sup>31</sup> In essence, earnings from pornographic businesses are not lawful. Exposure of children to it can defeat the objectives of Islamic law of religion and intellect of the children. It should therefore be criminalized in a Muslim country like Libya. A look at the current state of the law in that country would however reveal that the act has not yet been criminalized. A leave can therefore be borrowed from Australia.

#### 5. LAPSES IN THE LIBYAN LAW AND A LEAVE TO BORROW FROM AUSTRALIA

The Libyan Penal Codes, 1953, is not comprehensive enough to combat the crime of exposing children to pornography.<sup>32</sup> The Libyan criminal law on the issue is highly undeveloped when compared with the state of the law in other neighbouring countries like Egypt which has been updating its laws regularly on Online Crimes generally. Online Crimes are unique in many ways and this affects how it is committed and investigated. Some notable weak points in the Libyan Penal Code that makes it inadequate to combat the exposure of children to online pornography including lack of provisions on the use of such device as Mobiles, CDs, and Computers. Also, fine as the punishment for obscenity is not suitable for the crime of exposure of children to online pornography while the latter is more dangerous and more badly influential. There is even no definition of what could amount to online child pornography. It therefore follows that the Libyan law needs some serious improvement to cater for this crime. But why is the choice of Australia other than any other Muslim country like Egypt?

The answer to this question may be found in the fact that the Australian Law is one of the developed laws in protecting children against cyber space. In addition, Australia is a welfare country like Libya and both countries are engaged in providing some free services and aids, such as education, health care and so on to the people, and particularly to the children who are the weakest group in the society. Although Libyan lawmakers might currently lack much legal experience in legislation on cyber space, they can gain learnings from the practices in other countries. In this regard, Australian Laws provide necessary guide in combating

<sup>25</sup> Islamic Hijab Cover for Muslim Woman.. (accessed on 15 Feb 2016).

<sup>26</sup> Surah Baqarah Q2:172

<sup>27</sup> Saalih Ibn Humaid -Khutbah..Lawful Earnings

<sup>28</sup> Haram & Halal definition - Halal Certification. <http://blog.halalgoogling.com/what-is-haram-and-halal/>.

<sup>29</sup> 7 tips for Muslim businesses SoundVision.com<<http://www.soundvision.com/article/7-tips-for-muslim-businesses>>.

<sup>30</sup> Halal vs Haram. <http://islamicinvestingguide.com/MGIPF12/MGIPF12.html>.

<sup>31</sup> Umar Sulaiman Alashqar.*Ahakam Almal Alharam wa Dhawab Alentifaa wa Altasarf bihe fie Alfiqh Aleslamy. Dar Alnafaeis, Jordan 2004,1424H.*

<sup>32</sup> See particularly Articles 409 and 421 Of Libyan Penal Code.

child pornography where all forms of pornography that may impact negatively on children's thinking and behaviour have been well controlled.<sup>33</sup>

Still, it may be necessary to further clarify why Australia is the choice for the Libyan lawmakers to get lessons from in criminalising child pornography. The basis for this can be appreciated using comparative law methods.<sup>34</sup> So, to achieve the objective of law reform,<sup>35</sup> the *Horizontal Comparison* approach will be useful. Jurists of comparative law define horizontal comparison method as the usage of comparison between two or more legal systems or institutions which belong to the same level as national laws.<sup>36</sup>

Another method of comparative law that may be relevant and useful is called *Legal Transplant*. Watson defines this as "the moving of a rule or a system of law from one country to another, or from one people to another".<sup>37</sup> It can be understood from this definition that it focuses only on law itself without reference to any other social value or customary law too. Esin Orucu refers to this theory as *Legal Transportation* and explains that "this occurs to suit the particular socio-legal culture and serve the needs of the recipient."<sup>38</sup> This definition is wider and considers the social culture and the real needs of recipient's country before transferring another country's laws. It may therefore be beneficial for the Libyan lawmakers to draw from the Australian laws what may be compatible with the Libyan Culture. This makes the process of legal transplant more relevant.

Recently, Australia released its "New National Network for Reporting Online Child Sexual Abuse Content"<sup>39</sup>. This is a significant document meant to monitor everyone who watches illegal online content (child pornography). The declaration is in its first phase focused on Combating Child Exploitation Material Online. For effective implementation, the regional cooperation forum is being co-hosted by the ACMA and the Australian Federal Police<sup>40</sup>. This new mechanism will provide great results in enhancing child online protection and reducing the crime against children. This is a great lesson for Libya showing that policy document can also be useful in safeguarding the children against online pornography.

## 6. CONCLUSION

E-transactions or online businesses are not prohibited in Islamic Law if they are within the confines of the *Halal* activities. This condition is to maintain the best public interest. It is understandable from Islamic principles that trading in forbidden things or materials could have a debasing or immoral impact on the Muslim community. Therefore, trading in online pornography is unlawful in Islamic law because of its negative influences on children and adults as well. So, the Libyan law, which is based on Islamic law as its main source for deriving rules and regulations is duty bound to criminalise online pornography and any trading relating to pornographic materials that may violate the important principles in Islamic Law.

For Libyan legislators to be properly guided in their approach towards achieving this laudable legislative imperative in the country, this paper has shown why and how lessons can be drawn from the practice in Australia. It is therefore expected that if the recommendation made in this study is implemented in Libya, Libyan children would be better protected against online pornography.

This study has explored the provisions of Islamic law on lawful transactions and this revealed that porn businesses are unlawful transactions. As the objective of this study is to guide Libya in coming up with effective legal measures against exposure of children to online pornography, a comparative law methodology of horizontal comparison and transplant approaches have also been explored. Through these approaches, the justifications for resort to Australia rather than other countries become clarified. Thus, as a welfare state like Libya, the positive impact which the Australian law has made in curtailing the acts of child exposure to online pornography can be presumed to be feasible in Libya if the law is transplanted, with modifications as may be necessary. It is recommended for Libya and indeed all other countries to begin to advance child exposure to online pornography as a sort of child abuse and violation of the child rights to dignity of human person and freedom from exploration. This would be an impressive means to protect the best interest of the child which is the ultimate essence of protection of the rights of the child. After all, it is the duty of every State parties under the *UN Convention for the Protection of the Rights of the Child*, as stipulated

<sup>33</sup> See Australian Psychological Society. Submission to the Senate Environment and Communications References Committee Inquiry into the harm being done to Australian children through access to pornography on the internet, March 2016: <[http://www.psychology.org.au/Assets/Files/APS\\_Submission\\_on\\_harm\\_to\\_Australian\\_children\\_accessing\\_pornography.pfd](http://www.psychology.org.au/Assets/Files/APS_Submission_on_harm_to_Australian_children_accessing_pornography.pfd)> (accessed on 9<sup>th</sup> August 2016).

<sup>34</sup> Like Malaysian Law.

<sup>35</sup> Law reform means process of changing and updating laws, in order to address new economic and socio-legal problems and protect respected values of society.

<sup>36</sup> Roberto Scariglia. Comparative Methodology and Pluralism in Legal Comparison in a Global Age. Comparative Methodology and Pluralism in Legal Comparison in a Global Age, published 4 March 2015, Trieste, Italy. [PDF]. <[http://file.scirp.org/pdf/BLR\\_2015030414592583.pdf](http://file.scirp.org/pdf/BLR_2015030414592583.pdf)> (Accessed on 4<sup>th</sup> May 2016).

Also, Comparative Law and International Law: Methods for Ordering Pluralism By Mireille Delmas-Marty, professor at the Collège de France <<https://saudeglobaldotorg1.files.wordpress.com/2015/08/comp-and-int-law-final-21.pdf>>

<sup>37</sup> IRMA JOHANNA MOSQUERA VALDERRAMA . LEGAL TRANSPLANTS AND COMPARATIVE LAW. PhD researcher at the Faculty of Law University of Groningen, The Netherlands.

<sup>38</sup> Ibid

<sup>39</sup> New national network for reporting online child sexual abuse content, 27 February 2017 <<http://acma.gov.au/Citizen/Internet/eseurity/Staying-safe-online/acma-and-australian-police-cement-national-network-for-reporting-online-child-sexual-abuse-content>>. (accessed on 14<sup>th</sup> March 2017)

<sup>40</sup> Ibid

