Victims' Rights Protection Strategies Under Cyberbullying in China: The Nexus Between Criminal Liability and Civil Liability

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Abstract. In today's society, cyberbullying has become a pressing social issue, causing significant impacts on victims and the broader community. This research aims to comprehensively understand and address the problem of cyberbullying to minimize its harm to individuals and society. The paper employs various methods and analytical frameworks such as legal interpretation, literature review, and comparative analysis. It offers an exhaustive analysis of the definitions and manifestations of cyberbullying and the legal obstacles encountered by victims during the process of seeking redress and protecting their rights. Drawing insights from international experiences, proposing targeted legal recommendations, and discussing the balance between criminal and civil regulations, this paper presents a multifaceted and unique analysis for the legal regulation of cyberbullying. The findings reveal that the current legal framework addressing cyberbullying has its shortcomings and requires further refinement. In the conclusion, this paper summarizes its main discoveries, highlighting the complexity of regulating cyberbullying legally. It suggests three approaches for enhancement, including learning from international cyberbullying legal practices, introducing targeted laws, and balancing criminal and civil regulations under cyberbullying in China. This paper hopes these methods will provide valuable insights for policymakers and the legal community to formulate more effective legal norms on cyberbullying, ensuring social safety and stability, and offering fresh perspectives and considerations for the legal research and practice of cyberbullying issues.

Keywords: Cyberbullying; Cybercrime; Legal Regulation; Balance between Criminal and Civil Regulations.

1. Introduction

On August 28, 2023, the China Internet Network Information Center (CNNIC) released its 52nd China Internet Development Statistics Report (hereinafter referred to as "the Report") in Beijing. The Report indicates that as of June 2023, the number of internet users in China reached 1.079 billion, an increase of 11.09 million compared to December 2022, with an internet penetration rate of 76.4%. As vast numbers of netizens flood into public spaces, illicit information spreads unabatedly across the web, potentially leading to cyberbullying and triggering broad social risks. In contemporary society, cyberbullying has manifested as a severe societal challenge, inflicting significant impacts on victims and the larger community.

Cyberbullying incidents have surged in recent years. Tragic cases include Dr. An from Deyang, Sichuan, who took his own life after being "human flesh searched"; Tang from Huizhou, Guangdong, who attempted suicide twice after being accused of "faking death for attention"; 15-year-old Liu Xuezhou, who faced thousands of malicious comments while searching for his family; the mother in the "Wuhan Campus Crush Case" who couldn't bear the cyberbullying and took her life; Zheng Linghua, a female postgraduate from Hangzhou, Zhejiang, who succumbed to depression and committed suicide after being cyberbullied for dyeing her hair pink; and the internet celebrity "Guanguan" who couldn't withstand half a year of relentless online bullying and took her own life. From "verbal wounds" to "death by keystrokes", the escalating incidents associated with cyberbullying have alarmed us that addressing this menace is urgently required.

An in-depth exploration of the issue of cyberbullying, as presented in this paper, assists the academic community in broadening their understanding of the problem, offering fresh perspectives and insights. By examining the rights protection strategies of victims and the connection between criminal and civil liabilities, we can better safeguard the rights of the victims. Such an examination
deepens our comprehension of the cyberbullying issue, providing valuable legal suggestions to address it. Similarly, the three enhancement recommendations proposed in this paper can offer new legal practice perspectives on the cyberbullying issue for legal practitioners, law enforcement agencies, and victims, aiding them in tackling the continuously evolving challenge of cyberbullying.

This paper pays attention to the recently released Guiding Opinions on Punishing Cyberbullying Crimes in Accordance with the Law (Draft for Solicitation of Opinions) from the Supreme People's Court, the Supreme People's Procuratorate, and the Ministry of Public Security (hereinafter referred to as "Opinions on Punishing Cyberbullying (Draft)"). This regulation bears significant importance for the governance of cyberbullying. However, the academic community's in-depth discussion of these guiding opinions is noticeably lacking. This study will employ literary research and legal interpretation methods to delve into the content and implications of these guiding opinions, furnishing future legal practices with fresh viewpoints and understanding related to cyberbullying. Simultaneously, this paper will explore the connection between criminal and civil liabilities. The nature of cyberbullying actions means they are addressed in both the realms of criminal and civil law. Yet, the academic debate on striking a balance between these two remains limited. Through legal comparative analysis and case studies, this research delves into the nexus between criminal and civil liabilities, offering new pathways of thought on how to regulate cyberbullying.

Through an in-depth exploration of these innovative perspectives, this paper aims to offer a multifaceted and unique analysis for the legal regulation of cyberbullying, while also presenting recommendations for enhancement. This paper hopes that these methodologies will provide essential references for policymakers, the legal community, and the academic world. The goal is to formulate more effective legal norms for cyberbullying, ensuring social safety and stability, and furnishing fresh perspectives and insights for the legal research and practice surrounding cyberbullying issues.

2. Fundamental Theories of Cyberbullying

2.1. Definition of Cyberbullying

At present, academia does not have a unified definition for cyberbullying. Scholar Jiang Fangbing believes that cyberbullying refers to actions where an unspecified majority spontaneously uses online platforms to verbally attack or maliciously defame parties involved in certain online incidents [1]. Scholars Jing Lijia and Hu Jun define cyberbullying as the deliberate spread of illegal information online by individuals or groups, aiming to repeatedly and continuously harm specific individuals or groups, characterizing it as an unlawful criminal act [2]. Scholars Hou Yubo and Li Xinlin have sorted out two popular perspectives: one broadly defines cyberbullying as violent acts by netizens online, seeing it as an extension of societal violence on the internet; the other, in a narrower sense, defines cyberbullying as "soft violence" that severely attacks people's minds and souls through online behavior [3].

However, scholars Liu Xianquan and Zhou Zijian believe that cyberbullying is a complex social phenomenon and also a non-legal concept with a diverse range of meanings and scopes. Therefore, when applying criminal law to related behaviors, the use of the term "cyberbullying" should be minimized, shifting the focus from cyberbullying to specific acts that can be evaluated by criminal law, such as insult, defamation, infringement of citizens' personal information, picking quarrels and provoking troubles [4].

In the West, the U.S. Federal Commission for the Prevention of Crime defines cyberbullying as actions to transmit and post text and images that intend to harm and harass others through the Internet, mobile phones, and other devices [5].

The European Commission defines cyber violence as the use of computer systems (possibly also targeting an individual's environment, characteristics, or vulnerabilities) to inflict or facilitate violence on an individual, or to threaten the use of violence, leading to or potentially causing physical, psychological, or economic harm and suffering to the individual [6].
From a legal perspective, cyberbullying is not a legal concept. In China's existing laws, regulations, normative documents, and guiding documents lack provisions defining the scope and content of cyberbullying. They also lack enumerative regulatory measures. For the purposes of this article, cyberbullying is temporarily defined as: Malicious attacks, insults, defamation, or other forms of harm to individuals or groups carried out via the internet, social media, or other digital technologies. These actions may be public or anonymous, and their usual intent is to humiliate, threaten, or control the victim.

2.2. Specific Manifestations of Cyberbullying

Cyberbullying is a multi-layered and multifaceted social phenomenon, manifesting in various forms such as online rumors, internet insults, and doxxing. In an era characterized by the explosive growth of information due to big data, online rumors spread as swiftly as wildfire. These not only disrupt the ecological balance of online information but also severely impact the public's sense of security. Furthermore, while the openness and democratization of the internet provide the public with a broader platform to voice their opinions, the digital space lacks the strict norms and effective moral and legal constraints found in the real world. This has led to the rampant occurrences of online insults and personal attacks.

Doxxing, a particularly egregious form of cyberbullying, involves the collective effort to gather, analyze, and publicly disclose personal and private information about an individual. This not only constitutes a serious violation of one's privacy rights but can also give rise to a range of societal issues. These include public shaming on a mass scale, occupational discrimination, and long-term physical and psychological effects, further exacerbating the societal and psychological damages wrought by cyberbullying.

3. Legal Obstacles Encountered by Victims in Pursuit of Accountability and Rights Protection

3.1. Legal Obstacles When Facing Insults and Defamation

If the cyberbullying actions that the victim experiences can be characterized as the crime of insult and defamation under Article 246 of the Criminal Law, this article posits that, according to the latest enacted Opinions on Punishing Cyberbullying (Draft), three major legal obstacles have been addressed.

The first is the reinforcement of the procedure for police assistance in evidence collection. The Opinions on Punishing Cyberbullying (Draft) specifies that when a victim initiates a private prosecution for online insults or defamation, if the People's Court determines that the victim faces difficulties in providing evidence, it can request the public security organs to provide assistance as stipulated in the third clause of Article 246 of the Criminal Law. Public security organs should promptly identify the main actors based on the court's requirements and the specific circumstances of the case, collecting evidence related to the spread and impact of the defamatory information. If the collection of evidence with the assistance of public security organs meets the acceptance criteria for a private prosecution case, the People's Court should decide to file the case. If relevant evidence cannot be collected, the public security organs should provide a written explanation to the People's Court. It's noteworthy that, due to difficulties in investigating, collecting evidence, and pinpointing the perpetrators, very few cases of cyberbullying actually enter the criminal prosecution process [7].

The second is clarifying the procedure for transitioning from private prosecution to public prosecution. There is a clear discrepancy between the stipulations of Article 246 of the Criminal Law and the provisions of the first clause, second item of the Interpretation of the Criminal Procedure Law. The latter stipulates that if the victim can provide evidence of being insulted or defamed, the People's Court should legally accept it, implying that these cases can be either publicly prosecuted or privately prosecuted. However, in reality, the criteria for public prosecution and private prosecution of insult
and defamation crimes differ significantly in logic: Only actions that seriously harm social order and national interests should be subjected to public prosecution; those that don't meet these criteria can only be privately prosecuted.

The Opinions on Punishing Cyberbullying (Draft) points out that for online insults and defamation criminal acts that seriously disrupt social order, the public security organs should promptly file a case according to the law. If the victim also initiates a private prosecution to the People's Court, the court should advise the private prosecutor to withdraw the prosecution or rule it inadmissible. If it has already been accepted, the court should rule to terminate the trial, and the original private prosecutor can participate in the lawsuit as the victim. For those online insults and defamation actions deemed too severely disrupt social order, the People's Court should transfer the case to the public security organs after review.

The third is accurately grasping the public prosecution criteria for insult and defamation crimes. Article 246 of the Criminal Law stipulates that insult and defamation crimes are not cases that can be both publicly prosecuted and privately prosecuted. Unless these actions "seriously harm social order and national interests", they are mostly regarded as private prosecution cases in most situations. However, in actual operation, there has been no clear provision on how to define whether insults and defamation on the internet constitute a "serious harm to social order and national interests". The reality is that, based on existing legal provisions, cases of cyberbullying involving insults and defamation emphasize private prosecution for punishment. This narrows the scope of public prosecution, leading to a situation where victims are not unwilling to file a lawsuit, but are unable to, which actually deviates from the original intention of establishing the system of personal-reporting crimes [8]. After the implementation of the Opinions on Punishing Cyberbullying (Draft), the scope of public prosecution for online insult and defamation cases has been expanded, meeting the needs of rights protection in the digital age.

It's commendable that the Opinions on Punishing Cyberbullying (Draft) smoothens the procedure of transitioning from private prosecution to public prosecution for insult and defamation cases, reinforces the obligation of the public security organs to assist in evidence collection, clarifies the public prosecution standards for insult and defamation, and specifies the legal procedure for transitioning from private prosecution to public prosecution. This will, to some extent, promote the solution to the difficulty of criminally prosecuting cyberbullying.

3.2. Legal Obstacles Faced When Confronting Doxxing and Other Forms of Cyberbullying

What if the victim encounters cyberbullying that does not constitute a criminal offense? They have two possible responses.

Method one: the victim sues the perpetrator. First and foremost, the victim needs to promptly preserve evidence. The victim can then choose to file a civil lawsuit with the court. However, the first step in this process is case filing, and at this point, the victim faces a dilemma: they do not know the true information of the cyberbully. Due to Article 122 of the Civil Procedure Law, which requires a "clear defendant", the victim cannot file a case. Some courts, even without a case filing, have found upon investigation that the victim has difficulty in collecting evidence, and will issue a corresponding investigation order to the victim. However, many courts believe that an investigation order can only be approved after a case has been filed. So, without an investigation order, how can the victim make the perpetrator, hidden behind the internet, reveal their identity?

There is a critical challenge in the fight against online bullying and harassment: the anonymous nature of the internet. Even if a victim has evidence of harassment, they might not know who the perpetrator is. This anonymity protects the guilty, making it difficult for victims to get justice.

There are also technical aspects to consider. If the perpetrator uses VPNs or other methods to hide their identity and location, tracking them down becomes even more challenging. Plus, the international nature of the internet means that the perpetrator and victim could be in different countries, adding layers of legal complexity.
In summary, while there are mechanisms in place that can potentially help victims of online harassment, many obstacles, both legal and technical, can hinder their quest for justice. It underscores the need for continuous development in legislation and technical solutions to protect individuals from online threats and pursue perpetrators effectively.

Method two: The victim sues the online platform. The victim can send a legal notice to the online platform demanding information about the perpetrator. In this scenario, the online platform acts as the defendant, while the perpetrator is viewed as a joint tortfeasor. Once the victim obtains the perpetrator's information, they can sue the perpetrator. Judicial interpretations have provided a systematic design for this. As stated in Article 3 of the "Regulations of the Supreme People's Court on Several Issues Concerning the Application of Law in Hearing Cases of Civil Disputes over Infringement of Personal Rights and Interests Through Information Networks", when a plaintiff sues a network service provider, and the network service provider defends on the grounds that the alleged infringing information was posted by a network user, the people's court can, based on the plaintiff's request and the specific circumstances of the case, order the network service provider to provide information such as the name, contact information, and network address of the alleged infringing network user to the court. If the network service provider refuses to provide this information without a valid reason, the people's court can impose penalties on the network service provider in accordance with Article 114 of the Civil Procedure Law. Once the case is successfully filed and enters the trial procedure, the plaintiff can add the perpetrator as a defendant. In other words, the law allows the plaintiff, when they are unable to obtain information about the suspected infringing user, to initiate a lawsuit process for the convenience of the infringed party, and to sue the online platform as the defendant. If the online platform raises a defense of third-party infringement, the court may order the online platform to disclose the identity information of the suspected infringing user. However, this provision is merely a stopgap measure to address the procedural obstacles faced by the infringed party under the current litigation procedure framework. The plaintiff first sues the online platform, followed by the online platform's defense. The court then orders the online platform to provide user information of the infringer, and then adds the defendant. Completing all these procedures before entering the substantive trial procedure is undoubtedly cumbersome. This prolonged procedure reduces the efficiency of relief, delays the results of the infringed party's rights protection, dampens the enthusiasm of the infringed party to defend their rights, and hinders the regulation of online bullying behavior.

Under the current legal system, when victims face types of online bullying other than insult and defamation, the cost of seeking justice through litigation is high, and the efficiency of relief is low. As a result, many victims often choose to remain silent when confronted with online bullying. As the harm inflicted by online bullying continues to escalate without timely redress, many cases of cyberbullying go unresolved and unaddressed. The lack of proper punishment for these online aggressors only emboldens them, further fueling the proliferation of online bullying behaviors.

4. Recommendations for Improving the Legal Regulation of Cyberbullying

4.1. Drawing from International Experiences in Cyberbullying Legal Regulations

In 2017, the German Parliament passed the Network Enforcement Act (Netzwerkdurchsetzungsgesetz, NetzDG). This legislation significantly strengthens the responsibilities of internet platforms, which are categorized as one type of online service providers, by adding a series of obligations and penalties.

The German Network Enforcement Act provides a convenient channel for addressing cyberbullying, aiming to efficiently manage online bullying incidents and reduce harm. For instance, the act mandates social networking platforms to establish an effective and transparent system to promptly identify and address user complaints about illegal content within the platform space. As a general rule, the act ensures that manifestly illegal content is dealt with within 24 hours, while other illegal content should be removed or blocked within seven days [9].

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Furthermore, the legislation requires online platforms to provide an online reporting form, allowing the broad base of internet users to report incidents of online bullying in real-time. The German Ministry of Justice also plans to launch an online form targeting internet users. If an online platform or the relevant department fails to fulfill its supervisory duties concerning online bullying, any internet user can lodge a complaint. Additionally, given the irregular and non-transparent regulation of online platform information in Germany, the act stipulates the periodic reporting obligation for online platforms. These platforms are required to regularly report their supervisory status to the relevant departments. This aims to standardize the urging of online platforms to perform their supervisory duties, reinforce the platform's primary responsibility, proactively curb or handle issues of online bullying from the outset, and maintain online order [10].

Even though the primary objective of the Network Enforcement Act (NetzDG) is to "counteract the coarsening of the discussion culture on social networks" and to offer media protection to adolescents, promoting the healthy development of children and teenagers, many scholars have pointed out that the Act isn't driven by economic interests. Instead, it largely focuses on curbing the spread of illegal content on social networks [11].

China can glean multifaceted insights from Germany's Network Enforcement Act to comprehensively and efficiently tackle the problem of cyberbullying. Firstly, it might be prudent to consider stipulating a rapid response and action mechanism within the current legal framework. This would mandate social media platforms and other online platforms to address blatantly illegal or infringing content within a short timeframe, thereby minimizing the continuous harm to victims.

Secondly, through legal means, the primary responsibilities of online platforms can be reinforced. This includes regular reporting of their online supervisory activities to relevant departments and timely deletion or blocking of patently unlawful content. Such measures would not only enhance the platforms' compliance but also bolster their motivation to monitor user behaviors more vigilantly.

Moreover, China could integrate enhanced public participation and transparency mechanisms. For instance, by establishing online reporting and complaint channels, ordinary users can be more conveniently involved in internet governance, thus elevating the overall transparency and credibility of the governance system.

Lastly, a holistic approach to internet governance should be adopted. This involves user education, clarity in legal responsibilities, and the application of technological solutions, culminating in a diversified and multi-layered system for preventing and mitigating cyberbullying.

4.2. Introduction of Specific Legislation for Cyberbullying

Currently, legislations related to cyberbullying are scattered across various norms, such as the Civil Code, Criminal Law, Public Security Administration Penalties Law, Cybersecurity Law, and Personal Information Protection Law, extending even to departmental regulations and normative documents. Despite these myriad governance measures, the impact on curbing cyberbullying remains inconspicuous. A joint online survey on cyberbullying by the Legal Weekend and the China Youth Daily Social Survey Center, involving 1,000 youths, revealed that "65.3% of the respondents said they or their acquaintances have experienced cyberbullying" and "71.9% of the respondents feel that the frequency of cyberbullying is increasing" [12].

These documents not only lack direct specificity in addressing cyberbullying but also lack regulatory cohesion. Even though the publication of the Opinions on Punishing Cyberbullying (Draft) has to some extent propelled solutions to the difficulty of prosecuting cyberbullying cases criminally, it is not a revision of the criminal law. It can only supplement and refine the law from an interpretative standpoint, ensuring more synergy within the criminal law system when new situations arise. However, it is not a panacea for comprehensively addressing the issue of cyberbullying.

For instance, in its second section titled Accurately Applying the Law to Strictly Punish Cyberbullying Offenses, the application rules of the criminal law were constructed for online defamation, online insults, and infringement of citizens' personal information, all using the phrasing "If it meets the provisions of Article...of the Criminal Law, it shall be convicted and punished for ..."
crime." This implies that for the aforementioned forms of cyberbullying, criminal liability for the perpetrators can only be pursued if their actions "comply" with the existing stipulations of the Criminal Law. However, the unique characteristics of cyberbullying, such as its incitement, bullying, and group nature, as well as its various forms like cyberbullying through internet language, cyberbullying through 'human-flesh searches', and cyberbullying that causes public disturbances, do not completely align with the existing criminal law and its related explanations [13]. This results in difficulties in practice, as these specific types of cyberbullying behaviors cannot easily be categorized and penalized under the current legal definitions. Therefore, there is a need to consider introducing new laws to regulate cyberbullying in order to better address the issue.

For instance, the Draft Opinion on Punishing Cyberbullying seems to have an inclination, suggesting that acts of insult and defamation committed through cyberbullying have significant societal harm, and should be subjected to a broader application of the public prosecution procedure [14]. As discussed earlier, when victims encounter types of cyberbullying other than insults and defamation, under the current legal system, seeking legal redress is costly and the relief is inefficient. However, if a new law stipulates something along the lines of "when a victim can provide evidence of being subjected to cyberbullying, law enforcement agencies or other authorized departments shall assist the victim in the investigation" and makes it clear that such investigations are not restricted to civil, administrative, or criminal jurisdictions, it will simplify the redress process for victims, enabling them to receive timely and effective relief.

In conclusion, this article believes that a long-term legal solution for combating cyberbullying is to establish a dedicated Anti-Cyberbullying Law. This law should not only clarify the specific charges but also simplify the process for victims to seek justice. Indeed, many representatives of the National People's Congress and members of the Chinese People's Political Consultative Conference have called for the enactment of an Anti-Cyberbullying Law [15].

4.3. The Balance Between Criminal and Civil Remedies in the Context of Cyberbullying in China

In the current legal system, the intricate civil redress procedures have led to a phenomenon where the cost of seeking justice for cyberbullying acts, such as defamation and insults which fall under criminal offenses, is lower and the relief more efficient compared to other types of cyberbullying that are treated as civil torts. Does this lead victims to opt for criminal litigation whenever they encounter any form of cyberbullying?

In recent years, there have been numerous instances of individuals facing criminal liabilities due to their online comments, some of the notable cases being the "Shaanxi Zhidan Text Message Case", "Hainan Danzhou Online Folk Song Case", "Zhangjiachuan Teenager Weibo Case", "Doctor's Post Questioning Hongmao Medicinal Liquor Case", "Chongqing Pengshui Poetry Case", "Henan Lingbao Wang Shuai Case", "Guangdong Foshan Internet Repost Detention Case", "Sichuan Lingxi Deng Yonggu Libel Case", "Ningxia Wang Peng Whistleblower Case", "Inner Mongolia Wu Baoquan Case", and the "Guangyuan Maggot-infested Orange Rumor Case". A common thread among these cases is that they all involve individuals facing legal consequences for expressing their views on the internet. Due to the magnifying effect of the internet, these cases drew widespread public attention and skepticism, some even influencing the final judicial direction [16].

Both criminal and administrative laws are prone to overreach in the name of maintaining order, prosecuting actions that might have been better addressed as civil torts as criminal offenses. Thus, according to this paper, if no targeted legislation is put in place, the civil law should be more proactive in setting specialized offenses. Conversely, criminal law should take a more restrained approach, adhering to the principle of the last resort.

In the tort liability section of the Civil Code, it is imperative to establish specialized offenses for regulating cyberbullying. This would entail the precise identification of the elements that constitute cyberbullying offenses, such as the parties involved in cyberbullying, types of cyberbullying behaviors, responsibility allocation, and the consequential harm. Moreover, it's essential to clearly
define the penalties for cyberbullying and clarify the legal liabilities that offenders must bear. Such an approach would also foster widespread recognition that acts of cyberbullying are unlawful and criminal in nature. Through the authoritative nature of the law, we can guide societal behavior from the top-down, ensuring that people understand that the internet isn't a law-free zone, thereby purifying the online environment.

Resorting to criminal law to regulate online speech should be a last resort. Within the toolbox of legal regulations against cyberbullying, criminal law should be viewed as the last, supplementary tool. It should act as a shield, not a sword, and shouldn't be the primary go-to. This is because, in cases involving insults and defamation, civil remedies such as apologies, compensation for damages, and remediation of harm can restore the victim's rights. Therefore, in less severe cases of cyberbullying, if the perpetrator actively assumes civil liability, they could be considered for exemption from criminal responsibility [17].

5. Conclusion

Cyberbullying is an increasingly severe social issue that has inflicted significant harm on individuals and society at large. In addressing the problem of cyberbullying, it's crucial to uphold the freedom of speech while firmly combating online behaviors that infringe on the rights of others and disrupt social order.

Through an in-depth discussion of the definition and manifestations of cyberbullying, as well as the legal challenges faced by victims in seeking redress and asserting their rights, this paper has put forth three comprehensive recommendations. These include drawing insights from foreign cyberbullying legal regulations, introducing targeted legislation, and striking a balance between criminal and civil remedies in China's approach to online violence.

Of course, the strategies for managing cyberbullying go beyond these suggestions. For instance, societal organizations should intensify their efforts in promoting awareness and education about cyberbullying, aiding the public in grasping legal liabilities and avenues for asserting their rights. Citizens should also foster a heightened sense of legal consciousness, actively safeguarding their rights while adhering to laws and regulations and refraining from engaging in cyberbullying.

The issue of cyberbullying presents a complex yet pressing challenge. However, with the combined efforts of the state, society, and citizens, we are confident in finding better solutions. This will ensure the protection of everyone's rights in the digital realm and pave the way for a more harmonious online society.

References


