

## AN EMERGENCE FOR REFORMATION OF CYBER BULLY'S LAW IN MALAYSIA

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**Abstract:** *The development and sophistication of technology does not guarantee a person's manners in conversations through social media. According to the United Nations Children's Fund (UNICEF) report released in 2020, Malaysia ranked second after India in cases of cyber bullying. According to this report, three out of ten Malaysian teenagers have been victims of cyber bullying. The application of relevant laws in the prosecution of cyberbullies is being debated. A lot of articles discussing this issue in term of criminal perspective as well as suggestion made by the NGO and government. Therefore, this study aims to identify the provisions of laws dealing with the issue of cyber bullying in Malaysia since the issue being debated in 2020. This study uses a qualitative approach through library research. The data is collected through document analysis inductively by reviewing court cases, journals, books, conference papers, newspapers and statutes such as the Penal Code, the Communications and Multimedia Commission Act 1998 and the Minor Offenses Act 1955. The results of the study found that there is no specific statute in order to prosecute the accused person who involve in cyberbullying cases, however the cabinet have approved the amendment to the Penal Code by inserting specific provision for the liability of cyberbully.*

**Keywords:** *cyberbully, criminal law and Penal Code*

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## Introduction

The development and sophistication of technology does not guarantee a person's manners in conversations through social media. According to the United Nations Children's Fund (UNICEF) report released in 2020, Malaysia ranks second in the Asian region after India in cases of cyber bullying (Faisal, 2022; Arziana, 2024).

The Minister of Home Affairs, Dato' Seri Hamzah Zainudin stated that the number of recorded cases related to cyber bullying, forgery, trespassing, data fishing and email fraud has almost doubled. Deputy Chief Secretary for Security of the Ministry of Home Affairs (KDN), Datuk Abdul Halim bin Abdul Rahman, cyber-crime cases across the country increased to more than 20,000 cases in 2021 (Abdul Halim, 2022).

In addition, the Deputy Minister of Communications, Teo Nie Ching stated that the statistics conducted show that TikTok is among the platforms that have the most content related to cyber bullying based on records from January 1 to November 15, 2023. In 2021, a total of 326 cases were recorded, but increased to 3,887 cases in 2022. The figure continues to rise to 4,994 cases between January and October 2023 (Arziana, 2024).

Based on data released by the Malaysian Communications and Multimedia Commission (MCMC), during the two-year period from 2022 to July 9th, there were, on average, almost ten instances of cyberbullying per day throughout the nation. The commission received 9,483 complaints of cyberbullying during this time, with 4,878 of the incidents involving women as the victims and 4,605 involving men.

Meanwhile, 16.4 million people, or 57.5 percent of Malaysians who use social media for leisure, are either directly or indirectly exposed to cyberbullying, according to the Digital Global Report 2024.

In 2019, a 16-year-old girl who died by suicide after creating an online poll asking viewers to vote on whether she should live or die, ultimately jumping from the roof of a building (Fullerton, 2019; Razali, N.A et al, 2022). Later, in May 2020, a 20-year-old woman tragically took her own life by hanging in her home after receiving negative feedback on her TikTok videos, which had circulated widely on Facebook (Nortajudin, 2020; Razali, N.A et al, 2022). The most recent incident involving the passing of TikTok celebrity A Rajeswary, popularly known as Esha, brings attention to the growing problem of cyberbullying in contemporary culture. The Magistrate Court held that P Shalini, 35 years old convicted for using offensive language on their TikTok account to incite anger for disturbing the peace at a premises on Jalan Ipoh, at 4:10 a.m. on July 1, 2024. She was sentenced for fine RM100 under the Minors Act 1955. Meanwhile, at the Session Court, B Sathiskumar, 40 years old, a lorry driver was charged for making and initiating an obscene and defamatory communication about Esha's mother on the TikTok application. He was charged under two offences which were under Section 233 of the Communications and Multimedia Act 1998 and Section 509 of the Penal Code. The Court handed down the sentence on him after he changed his plea of guilty to two charges. The Court ordered him to serve 12 months on each charge, concurrently from date of his arrest on July 10, 2024.

The issue of sentences against P Shalini become unpleasant satisfaction for society generally as well as for Esha's family. The impact of cyberbully towards the victim tremendously violet the freedom of life (Article 5(1) of Federal Constitution).

Based on the issue raised, this study aims to examine the existing laws relating to the offences cyberbullying particularly the suggestion for amendment of Penal Code and Criminal Procedure Code (CPC) which have been approved by the Cabinet and expected to be tabled in the Parliamentary session. This might be filling the loopholes within the law against cyberbullies.

### **Literature Review**

The usage of the social media as a communication channel has grown tremendously and has become a necessity instead of a luxury. While there are many benefits to social media, such ubiquitous communication can also be used for negative purposes. For instance, cyberbullying has emerged as a potential harm with negative influence on the mental health. Cyberbullying may have many serious and negative impacts on a person's life and even lead to suicide (Ariffin, A. et.al, 2021).

#### **Medium of Cyberbullying**

The Malaysia National Cybersafe Schools Survey 2013 found that a quarter of school children have frequently encountered online bullying through Facebook, blogs and instant messaging (Pawelczyk, K, et al ,2014; Mohd Fadhli, S. A., et al, 2022).

Previously, a research conducted by Sivabalan, T.V et al 2020 indicated that the bully used Facebook and mobile phone social apps as a common platform to do the act of cyberbully against the victim. Similarly research conducted by Sood, S.M.M et al 2023 stated that 49% of respondents being victims of online bullying particularly from Facebook, Instagram, Tik tok and Twitter. Though the research has been done, the cases unable to reduce the increasing number occurred (Shaikh, F.B.,et al, 2021). Most of the research discussing the issue on the part of psychology Lee, M.H, et at, 2023; Shaikh, F.B et al, 2021; Sivabalan, T.V, et al, 2020).

#### **Legal of Ponder**

Meanwhile, research on cyberbullying in Malaysia, from a legal perspective, has recently become point of ponder among the legal academician (Razali, N.A, et al, 2017; Mohd Sharil Ibrahim, 2021; Razali, N.A & Nawang, N.I, 2022). Similarly, there is lack of evidence for the accused being punished or if the victim makes a report, they will face further victimisation or ostracism (Nasruddin, Z.A, et al., 2023) as well as due to embarrassment and lack of clear understanding of what constitute bullying (Rusli, R., et al., 2024).

### **Methodology**

This study uses a qualitative approach and was conducted instrumentally and intrinsically based on the current cases. The data is collected through document analysis (Bowen, 2009) inductively specifically using doctrinal legal research by reviewing court cases (current cases), journals, books, conference papers, newspapers and statutes such as the Penal Code, the Communications and Multimedia Commission Act 1998 and the Minor Offenses Act 1955 as well periodicals either obtained online or in printed.

### **Results And Finding**

#### **Definition**

Cyberbullying is a form of harassment that occurs through digital platforms such as social media, messaging apps, and emails (Kowalski et al., 2014). Unlike traditional bullying, which is typically face-to-face, cyberbullying leverages the anonymity and reach of the internet to inflict harm. The phenomenon has gained prominence with the proliferation of technology and

internet usage, affecting individuals across various age groups, but particularly adolescents (Smith et al., 2008).

Cyberbullying manifests in several forms including direct verbal abuse, the spreading of false information, and exclusionary tactics executed online (Hinduja & Patchin, 2015). This digital form of bullying can be persistent, happening around the clock and often remaining visible to a wide audience. The pervasive nature of the internet means that harmful content can spread quickly and broadly, amplifying the negative impact on victims (Zhang et al., 2014).

The psychological effects of cyberbullying are profound, often leading to issues such as depression, anxiety, and low self-esteem in victims. The lack of physical presence and the perceived anonymity of online interactions can exacerbate the severity of the emotional harm inflicted (Campbell, 2005). Addressing cyberbullying requires a multifaceted approach, including education about online etiquette, effective legal frameworks, and support systems for victims (Hinduja & Patchin, 2015).

The victims of bullying also might suffer psycho-logical, emotional, and behavioral problems in the long term, such as depression, loneliness, isolation, anxiety, addiction and self-harm. Furthermore, poor social relations and lack of trust in others make them more susceptible to exploitation and lacking self-assertion skills (Al-Turif, 2023). According to (Mohammed, 2020), the tendency of the victims to commit suicide as a way to escape from their suffering constantly increasing due to bullying.

In summary, cyberbullying represents a significant challenge in the digital age, demanding coordinated efforts to mitigate its effects and promote a safer online environment. The understanding and response to cyberbullying are critical in protecting individuals from its damaging consequences.

#### **Legal Framework of Malaysian's Law**

According to Dr. Khairil Azmin Mokhtar, there is no specific legislation addressing bullying, either in criminal law such as the Penal Code or in civil law such as the Education Act 1996. Furthermore, there is no law that provides a definition of 'bullying' (Raja Nur Aznie Aida, Sinar Harian, 2022).

#### **Communication and Multimedia Act 1998 (CMA 1998)**

According to section 211(1) of CMA 1998, *no content applications service provider, or other person using a content applications service, shall provide content which is indecent, obscene, false, menacing, or offensive in character with intent to annoy, abuse, threaten or harass any person and according to subsection (2), whoever contravenes subsection (1) commits an offence and shall, on conviction, be liable to a fine not exceeding fifty thousand ringgit or to imprisonment for a term not exceeding one year or to both and shall also be liable to a further fine of one thousand ringgit for every day or part of a day during which the offence is continued after conviction.*

In this provision such indecent, obscene, false, menacing or offensive content with the intention to annoy, abuse, threaten or harass any person considered as an offence. The word 'content' is provided under section 6 of the said Act means *any sound, text, still picture, moving picture or other audio-visual representation, tactile representation or any combination of the preceding*

which is capable of being created, manipulated, stored, retrieved or communicated electronically.

While according to section 233(1), a person who by means of any network facilities or network service or applications service knowingly makes, creates or solicits; and initiates the transmission of, any comment, request, suggestion or other communication which is obscene, indecent, false, menacing or offensive in character with intent to annoy, abuse, threaten or harass another person commits an offence. Therefore, any person who commit such offence shall, on conviction, be liable to a fine not exceeding fifty thousand ringgit or to imprisonment for a term not exceeding one year or to both and shall also be liable to a further fine of one thousand ringgit for every day during which the offence is continued after conviction.

The former provision focusing on the intention of applications service provider or person in creating the content which indecent, obscene, false, menacing, or offensive in character. The element of intention (*mens rea*) should be proven where the defendant is intended or foresaw some kind of harm when they acted (Jonathan, 2022). In respect of the offence, proof of the intention to produce a particular result is an element of the offence.

In the case of *Hyam v DPP [1975] AC 55*, Hyam poured petrol through Booth's (her ex-boyfriend's new fiancée) letter box and then ignited it using a rolled-up newspaper. She did not warn anyone of the fire but simply drove home. The resulting fire killed two young children. Hyam was tried for murder. At trial she claimed that she had only intended to frighten Booth and had not intended to kill anyone. Hyam was convicted and appealed. The Court held that a person had the requisite *mens rea* for murder if they knowingly committed an act which was aimed at someone and which was committed with the intention of causing death or serious injury. Lord Hailsham also held that intention could also exist where the defendant 'knew there was a serious risk that death or serious bodily harm will ensue from his acts and he commits those acts deliberately and without lawful excuse with the intention to expose a potential victim to that risk as the result of those acts. It does not matter in such circumstances whether the defendant desires those consequences or not.'

While the latter provision, the word 'knowingly' simply means a person is aware of the nature of his conduct or that the circumstances exist. Knowledge is an alternative to intention and where, even though there is no express allusion to knowledge, some element of knowledge is subsumed in the intention required to constitute liability for an offence. The principle was stated by Lord Goddard J in the case of *Bullock v Turnbull [1952] 2 Lalyd's Rep 33* where the words here show that before the person can be convicted of the offence, he must at any rate know the circumstances which will constitute offence.

However, according to (Ayub, A., & Zainal, Z. M. Y, 2020), it is quite difficult to prosecute cyber bullies for the offence under Section 233 of the CMA 1998 as the element of *mens rea* or criminal intent of the offender should be proved. Therefore, it is crucial for the court to take into consideration the age of the perpetrator, the content of the alleged statement and the closeness of the relationship between the perpetrator and victim in ascertaining the *mens rea* of the perpetrator before establishing the offence.

### Penal Code

Several provisions under Penal Code can be applied in order to prosecute cyber bullying perpetrators (Razali, N. A., & Nawang, N. I., 2022). Even though these provisions do not

provide for the definition or characteristics of cyberbullying nor any of the words of cyber bullying, but these provisions are extended to penalise the perpetrator of cyber bullying.

Section 503 of the Penal Code on criminal intimidation offence states that '*whoever threatens another with any injury to his person, reputation or property... with intent to cause alarm to that person... commits criminal intimidation*'. The person who are found guilty under this section will be penalised under section 506 with imprisonment for a term which may extend to two years or with fine or with both; and if the threat is to cause death or grievous hurt shall be punished with imprisonment for a term which may extend to seven years or with fine or with both. Based on this provision, causing injury to another person, reputation or property is considered as criminal intimidation which may amount to imprisonment or fine or both.

In addition, by referring to section 507 of the Penal Code it was visibly mentioned that criminal intimidation by an anonymous communication can amount to imprisonment. This provision may be used to prosecute the offender of cyber bullying as there is no specific criterion imposed by this section.

Whilst the provisions of section 509 Penal Code provides that a person is said to commit criminal offence if he intends to insult the modesty of another person by expressing any word, display any object with an intention such word or object shall be heard or seen by other person shall be punish with imprisonment or fine or with both. Acts of cyber bullying which involves posting humiliating content including words or sound, spreading rumours about other people including videos or photographs maybe considered as criminal offence under this provision. Unfortunately, application of this provision to cyber bullying act is difficult since it is not easy to proof the act of bullying done online.

Section 500 of the Penal Code provides that the person found guilty shall be penalised to imprisonment for two years or fine or both. In general, this provision may be used to accuse cyber bullying offender if the act involves imputation of other person that can harm the reputation of that person through intimidating rude or humiliating content of the victim.

An act of cyber bullying that involves suicide case may invoke section 306 of the Penal Code (abetment of suicide). However, this provision may be applied if there is a proof that the offender of cyber bullying has committed abetment of suicide over the victim who is an adult who is eighteen years above. If the victim is a child or insane person, section 305 of the Penal Code (abetment of suicide of child or insane person) will be applied to prosecute cyber bullying offender.

### **Minor Offences Act 1955**

The offender of cyber bullying may also prosecuted through section 14 of Minor Offences Act 1955 which reads '*any person who uses any indecent, threatening, abusive or insulting words, or behaves in a threatening or insulting manner, or posts up or affixes or exhibits any indecent, threatening, abusive or insulting written paper or drawing with intent to provoke a breach of the peace, or whereby a breach of the peace is likely to be occasioned, shall be liable to a fine not exceeding one hundred ringgit*'. Based on the provision, the maximum fine of the punishment is one hundred ringgit only and the court had no choice but to hand the sentence down. Such trivial punishment failed to act as an effective deterrent and does not convey the serious repercussions of cyberbullying. However, even though the punishment is not significant enough but with the variations of laws can be used to prosecute the offender should be applause.

The emergence needs for specific provisions relating to cyberbullying following the recent cases Esha's raised the concern and attention of publics and government. Recent development shows that the government had granted in-principle approval for amendments to the Penal Code and the Criminal Procedure Code concerning cyberbullying on social media along with the related bill, Online Safety Bill expected to be tabled in the Parliamentary session. Government studies indicate there is no clear definition of bullying, including cyberbullying, as a crime. Therefore, amendments considered crucial step to close the lacuna within the law, allowing for stronger actions against cyberbullies (Nation, 2024). Accordingly, inserting the classification of cyberbully and regarded the act as criminal offence in the Penal Code and amending Criminal Procedure Code to ensure the cyberbully's enforcement work effectively may give greater deterrence and protection to our society against cyberbully.

### **Conclusion**

Malaysia has Section 233 of the Communications and Multimedia Act 1998 and Section 507 of the Penal Code, but these laws are not sufficiently effective in addressing the issue of cyberbullying. Besides, the prosecutor has another option by using Section 14 of Minor Offences Act 1955 instead of the above two statutes. This happened to the case of A Rajeswary, popularly known as Esha. The Digital Minister, Gobind Singh Deo, has proposed new legislation to place responsibility on the owners of social media platforms for misuse, including cases involving cyberbullying.

Recently, on 10<sup>th</sup> December 2024, the Dewan Rakyat has passed the Penal Code (Amendment) Bill (No. 2) 2024 which aims to specifically address the issue of bullying done in any way or method including online. The bill, among other things, proposes a new subsection 507D (2) which stated that any person, in any manner, who uses words or communications that are threatening, insulting, or defamatory with the intent to provoke another person and cause harm to themselves or to others. The penalty for offence also provides that if the person provoked, attempts to commit suicide or commits suicide as a result of such provocation, the proposed punishment for the offence shall be imprisonment for a term which may extend to 10 years, or a fine, or both.

At the same times, in order to ensure the consistency with the amendment of the Penal Code, the Dewan Rakyat also passed the Criminal Procedure Code (Amendment) Bill (No 2) 2024 which among other things to provides for the determination of offences related to the need for an arrest warrant, the period for the issuance of a warrant or summons, the determination of whether the offence can be guaranteed or not, the determination of the compound and the maximum punishment for each offence related to the crime of bullying. Hence, the further study should be held in order to examine the effectiveness of newly inserted provisions in combatting cyber bullying in Malaysia.

## References

- Bernama. (2022, 14/1/2022). Buli Siber Dalam Kalangan Belia: Malaysia Kedua Tertinggi Di Asia. *Harian Metro*. Retrieved from [https://www.hmetro.com.my/mutakhir/2022/01/800032/buli-siber-dalam-kalanganbelia-malaysia-kedua-tertinggi-di-asia?\\_\\_cf\\_chl\\_managed\\_tk\\_\\_=Bh9SZ9Mx6JMGMh5co4fvd0qV3emkr7lwl1sCHx5JC\\_4-1642906581%E2%80%A6](https://www.hmetro.com.my/mutakhir/2022/01/800032/buli-siber-dalam-kalanganbelia-malaysia-kedua-tertinggi-di-asia?__cf_chl_managed_tk__=Bh9SZ9Mx6JMGMh5co4fvd0qV3emkr7lwl1sCHx5JC_4-1642906581%E2%80%A6)
- Hamat, T. S. R. (2021, 23/2/2021). Buli Siber, Maaf Sahaja Tak Cukup. *Kosmo*. Retrieved from <https://www.kosmo.com.my/2021/02/23/buli-siber-maaf-sahaja-tak-cukup/>
- Khalik, R. A. (2019, 14/5/2019). Remaja Bunuh Diri Selepas Dapat 69 Peratus Undian Instagram. *Astro Awani*. Retrieved from <https://www.astroawani.com/berita-malaysia/remaja-bunuh-diri-selepas-dapat-69-peratus-undian-instagram-207649>
- Kamaruzaman, Muhammad Afiq; Jasmi, Kamarul Azmi. (2022). Masalah Buli Siber di Malaysia. *Seminar Falsafah Sains dan Ketamadunan (SFST)*, 4(1) 2022, p. 399-406. Tema “Nilai dalam Falsafah Sains dan Tamadun.” Bertempat: Webinar: <https://utm.webex.com/meet/amdean>, 11 Januari 2022, anjuran Akademi Tamadun Islam (ATI), Fakulti Sains Sosial dan Ketamadunan (FSSK), Universiti Teknologi Malaysia (UTM). eISSN: 2805 556X.
- Zuki, N. M. (2020, 22/9/2020). Mangsa Buli Siber Berpotensi Bunuh Diri. *Sinar Harian*. Retrieved from [https://www.sinarharian.com.my/article/102088/BERITA/Nasional/Mangsa-buli-siber-berpotensi-bunuh-diri?\\_\\_cf\\_chl\\_managed\\_tk\\_\\_=mXY\\_g.2TeTTPXwwkhggzY8s70x.ozOfu1GGss1yhjxI-1642906848-0-gaNycGzNDaU](https://www.sinarharian.com.my/article/102088/BERITA/Nasional/Mangsa-buli-siber-berpotensi-bunuh-diri?__cf_chl_managed_tk__=mXY_g.2TeTTPXwwkhggzY8s70x.ozOfu1GGss1yhjxI-1642906848-0-gaNycGzNDaU)
- Campbell, M. A. (2005). Cyberbullying: An Old Problem In A New Guise? *Australian Journal of Guidance and Counselling*, 15(1), 68-76.
- Hinduja, S., & Patchin, J. W. (2015). *Cyberbullying: Prevention and Response*. Routledge.
- Kowalski, R. M., Giumetti, G. W., Schroeder, A. N., & Lattanner, M. R. (2014). Bullying in the digital age: A critical review of the literature and its application to policy and practice. *Policy Insights from the Behavioral and Brain Sciences*, 1(1), 122-128.
- Smith, P. K., Mahdavi, J., Carvalho, M., & Tippett, N. (2008). Cyberbullying: Its Nature And Impact In Secondary School Children. *Journal of Child Psychology and Psychiatry*, 49(4), 376-385.
- Zhang, R., Wang, J., & Yu, M. (2014). The Relationship Between Cyberbullying And Mental Health Among Adolescents. *Cyberpsychology, Behavior, and Social Networking*, 17(8), 533-539.
- Ariffin, A., Mohd, N., & Rokanatnam, T. (2021). Cyberbullying Via Social Media: Case Studies in Malaysia. *OIC-CERT Journal of Cyber Security*, 3(1), 21-30.
- Pawelczyk, K.; Singh, K.K.K. Exploring The Digital Landscape in Malaysia; UNICEF Malaysia: Kuala Lumpur, Malaysia, 2014; pp. 46–51, ISBN 978-967-12284-4-9.
- Mohd Fadhli, S. A., Liew Suet Yan, J., Ab Halim, A. S., Ab Razak, A., & Ab Rahman, A. (2022, May). Finding the link between cyberbullying and suicidal behaviour among adolescents in Peninsular Malaysia. In *Healthcare* (Vol. 10, No. 5, p. 856). MDPI.
- Razali, N. A., & Nawang, N. I. (2022). An Overview Of The Legal Framework Governing Cyberbullying Among Children In Malaysia. *IIUMLJ*, 30, 207.
- Herring, Jonathan. (2022). *Criminal Law*. New York: Routledge. 2<sup>nd</sup> Edition.
- Guan, S.T, Han, L.T, Chern, L.J & Lun, L.M. (2020). *Undang-Undang Media di Malaysia*. Petaling Jaya: Sweet & Maxwell.



- Razali, N. A., Nawang, N. I., & Mohamad, S. N. S. N. A. (2022). Cyberbullying in Malaysia: An Analysis of the Existing Laws *International Journal of Law, Government and Communication*, 7 (30), 124-135.
- Athira Nortajuddin, “Does Malaysia Have A Cyberbullying Problem?”; Lo Tern Chern, “Cyberbullying Victim Leaves Suicide Note,” *The Star Online*, May 22, 2020, <https://www.thestar.com.my/news/nation/2020/05/22/cyberbullying-victim-leaves-suicide-note>. accessed date 20 April 2021.
- Jamie Fullerton, “Teenage Girl Kills Herself ‘After Instagram Poll’ in Malaysia,” *The Guardian*, May 15, 2019, <https://www.theguardian.com/world/2019/may/15/teenage-girl-kills-herself-after-instagram-poll-in-malaysia> accessed date 20 April 2021.
- Sivabalan, T. V., Zaki, R. A., & Yuen, C. W. (2020). The prevalence of cyberbullying and its associated factors among young adolescents in Penang, Malaysia. *Journal of Health and Translational Medicine (JUMMEC)*, 202-211.
- Hazlin Hassan, “Malaysian Police Investigate Case Of Teen Who Committed Suicide After Instagram Poll”, *The Straits Times*, May 16, 2019, <https://www.straitstimes.com/asia/se-asia/malaysian-police-investigate-case-of-teen-who-committed-suicide-after-instagram-poll> date 16 May 2019.
- Shaikh, F. B., Rehman, M., Amin, A., Shamim, A., & Hashmani, M. A. (2021). Cyberbullying behaviour: a study of undergraduate university students. *IEEE Access*, 9, 92715-92734.
- Lee, M. H. L., Kaur, M., Shaker, V., Yee, A., Sham, R., & Siau, C. S. (2023). Cyberbullying, Social Media Addiction And Associations With Depression, Anxiety, And Stress Among Medical Students In Malaysia. *International journal of environmental research and public health*, 20(4), 3136.
- Razali, N. A., Nawang, N. I., & Mohamad, S. N. A. S. N. (2017, January). Cyberbullying in Malaysia: An Analysis of the Existing Laws. In *International Symposium & Exhibition on Business and Accounting*.
- Herring, Jonathan. (2022). *Criminal Law*. New York: Routledge. 2<sup>nd</sup> Edition.
- Guan, S.T, Han, L.T, Chern, L.J & Lun, L.M. (2020). *Undang-undang media di Malaysia*. Petaling Jaya: Sweet & Maxwell.
- Aziz, N. A., & Amin, N. S. M. (2020). Cyberbullying Among Children: A Cross Jurisdictional Perspective. *IIUMLJ*, 28, 325.
- Ariffin, A., Mohd, N., & Rokanatnam, T. (2021). Cyberbullying Via Social Media: Case Studies In Malaysia. *OIC-CERT Journal of Cyber Security*, 3(1), 21-30.
- Ayub, A., & Zainal, Z. M. Y. (2020). Legal Framework on Protection of Children against Cyberbully in Malaysia: A Cause of Great Concern. *International Journal of Advanced Science and Technology*, 29(8), 143-154.
- Al-Turif, G. A., & Al-Sanad, H. A. (2023). The Repercussions Of Digital Bullying On Social Media Users. *Frontiers in psychology*, 14, 1280757.
- Chan, T. K., Cheung, C. M., & Lee, Z. W. (2021). Cyberbullying On Social Networking Sites: A Literature Review And Future Research Directions. *Information & Management*, 58(2), 103411.
- Rosidi, N. S., & Jamil, S. N. M. (2024). Greetings From Hell (Neraka Kirim Salam): A Discourse Analysis Of Religious-Based Cyberbullying Of Dehijabis. *Journal of Nusantara Studies (JONUS)*, 9(1), 1-24.
- Al-Turif, G. A., & Al-Sanad, H. A. (2023). The Repercussions Of Digital Bullying On Social Media Users. *Frontiers in psychology*, 14, 1280757.
- Mohammed, M. P. (2020). Causes And Effects Of Cyberbullying On Pre-University Students. *J. Educ. Soc. Sci.* 22, 1–12.

- Nation. (2024, October 25). [Updated] Govt Approves Amendments To Penal Code Targeting Cyberbullying. New Straits Times. <https://www.nst.com.my/news/nation/2024/10/1125305/updated-govt-approves-amendments-penal-code-targeting-cyberbullying>.
- FMT Reporters. (2024). Lorry Driver Jailed 12 Months Over Cyberbullying Of Tiktok Influencer. <https://www.freemalaysiatoday.com/category/nation/2024/09/25/lorry-driver-jailed-12-months-over-cyberbullying-of-tiktok-influencer/> 25 Sep 2024, 02:06 pm.
- Malay Mail. (2024). Mum Of Influencer Esha Demands Justice After Cyberbully Gets Off With RM100 Fine Despite Suicide <https://www.malaymail.com/news/malaysia/2024/07/18/mum-of-influencer-esh-a-demands-justice-after-cyberbully-gets-off-with-rm100-fine-despite-suicide/144116> *Thursday, 18 Jul 2024 11:17 AM MYT*
- Dewan Rakyat Lulus Pindaan Kanun Keseksaan Bagi Tangani Buli Siber. <https://www.hmetro.com.my/mutakhir/2024/12/1164763/dewan-rakyat-lulus-pindaan-kanun-keseksaan-bagi-tangani-buli-siber>. **Disember 10, 2024 @ 7:53pm**
- So'od, S. M. M., Ramamurthy, L., Naw, N. S. M., Shafien, S., Abd Latif, S. F., Don, Z. M., & Syahfutra, W. (2023). Cyberbullying in the Social Media Environment: Investigating Young Adults' Experiences in Malaysia. *Environment-Behaviour Proceedings Journal*, 8(26), 85-91.
- Nasruddin, Z. A., Ariffin, N. H. M., Azmi, N. K. M., Nazri, U. M., Khairulrizal, N. H., & Mazlin, N. U. Z. I. (2023). Cyberbullying among Youths in Malaysia. *International Society for Technology, Education, and Science*.
- Rusli, R., Mahmud, M. M., Ramli, N. F. M., Tajizan, F. N., & Zakaria, S. F. (2024). Addressing Cyberbullying: Perspectives On University Actions From Malaysian Undergraduates. *Quantum Journal Of Social Sciences And Humanities*, 5(5), 362-372.