



## Legal protection for victims of cyberbullying: A comparative study between the Indonesian criminal law system and the South Korean legal system in the case of Kim Sae Ron.

Frans Haryadi Djauhari, Helmi Badjree, Nur Silfa Ismaya, Ria Tri Vinata

Faculty of Law, Wijaya Kusuma Surabaya, University Duhk Kupang, Surabaya, Indonesia

### Abstract

The advancement of digital technology has resulted in serious consequences, including the emergence of new forms of crime such as cyberbullying. The cyberbullying case involving Kim Sae Ron, a South Korean actress, serves as a concrete example of the negative impact of the online world on individuals' lives. This study aims to analyze the legal protection provided to cyberbullying victims by comparing the criminal law systems of Indonesia and South Korea. The research method employed is normative juridical research with a comparative law approach. In South Korea, cyberbullying is specifically regulated under the Act on Promotion of Information and Communications Network Utilization and Information Protection, in addition to general criminal law provisions, offering firm sanctions against perpetrators of online harassment. Meanwhile, in Indonesia, cyberbullying offenses can be prosecuted under the Law Number 11 of 2008 which was later amended to become Law Number 1 of 2004 concerning Electronic Information and Transactions (ITE Law), particularly concerning defamation and insult provisions; however, the regulation is considered not yet comprehensive in protecting victims. The research findings reveal that South Korea's legal system is more proactive in providing victim protection, including mechanisms for content removal and victim rehabilitation. On the other hand, Indonesia still needs to strengthen both substantive and procedural legal instruments to ensure the protection of cyberbullying victims. This study concludes that the effectiveness of legal protection for cyberbullying victims largely depends on the clarity of legal norms, assertiveness in law enforcement, and active community participation in creating a safe digital environment. These findings are expected to serve as a reference for future reform in Indonesia's criminal law policies.

**Keywords:** Cyberbullying, Kim Sae Ron, legal protection, comparative law, Indonesia, South Korea

### Introduction

The rapid development of information and communication technology has brought about significant changes in various aspects of human life, including social and legal aspects. While bringing many benefits, digital technology has also given rise to various new forms of crime that were previously unknown in conventional law. One such form of crime is cyberbullying, which refers to acts of harassment or abuse carried out through electronic media such as social media, digital platforms, or online forums. Cyberbullying has serious consequences for victims, both psychologically, socially, and legally. In this context, the case involving Kim Sae Ron, a South Korean actress, has drawn public attention as it highlights the severity of cyberbullying threats, even against public figures.

Kim Sae Ron became a victim of cyberbullying after facing several controversies in her career and personal life. The online harassment she experienced included insults, defamation, and systematic threats from internet users. This case illustrates how the online world can become a brutal and uncontrollable space, especially when used to spread hatred or damage someone's reputation. In South Korea, similar cases are not new, considering that several celebrities have also experienced severe pressure due to cyberbullying, which has even led to suicides. This has prompted the legal system to take decisive action to protect victims.

From a legal perspective, cyberbullying in South Korea is regulated through several legal instruments, including the Promotion of Information and Communications Network Utilization and Information Protection Act. In addition, general criminal law is also used to prosecute cyberbullies,

with fairly severe penalties. South Korea also has special legal procedures for removing harmful content and providing psychological rehabilitation services for victims. These measures demonstrate the country's serious commitment to combating cybercrime and protecting its citizens from the negative impacts of technological advancements.

Meanwhile, in Indonesia, regulations related to cyberbullying are still limited. Law No. 11 of 2008 concerning Electronic Information and Transactions (ITE) and its amendments serve as the primary legal basis for addressing acts of defamation, slander, and hate speech online. However, to date, there are no specific regulations that classify cyberbullying as a separate criminal offense. As a result, law enforcement in cyberbullying cases in Indonesia often faces challenges, particularly in terms of evidence, legal procedures, and victim protection. Additionally, the absence of a comprehensive mechanism for victim rehabilitation is another shortcoming in Indonesia's legal system.

Given these circumstances, it is necessary to conduct a comparative study between the criminal justice systems of Indonesia and South Korea in handling cyberbullying cases, particularly in the context of the Kim Sae Ron case. This study is important to provide an overview of how other countries, in this case South Korea, have developed a more effective and responsive legal protection system for victims of cyberbullying. Thus, Indonesia can learn valuable lessons to improve and develop existing legal instruments so that they are able to face the increasingly complex challenges of cybercrime.

This study is also relevant given the high rate of internet usage in Indonesia, which is accompanied by an increase in cyberbullying cases, especially among teenagers and young people. This phenomenon indicates the need for more adaptive legal reforms in line with technological developments, as well as the strengthening of more effective victim protection mechanisms. Without a clear and comprehensive legal framework, victims of cyberbullying will remain vulnerable, while perpetrators can easily evade legal responsibility.

Using a normative legal approach and comparative law methods, this study will analyze the relevant criminal law aspects in both countries. The main focus will be on the formulation of cyberbullying offenses, the criminal sanctions applied, victim protection procedures, and available rehabilitation efforts. It is hoped that the results of this study can make a real contribution to the development of Indonesian criminal law, particularly in the context of protecting victims of cybercrime.

Overall, the Kim Sae Ron case is an important starting point for examining how the legal system responds to new challenges in the digital world. Cyberbullying is not merely an ethical violation but has become a criminal offense requiring serious attention from policymakers, law enforcement agencies, and the broader public. Therefore, this study aims not only to compare criminal law aspects in Indonesia and South Korea but also to promote legal reforms that prioritize victims and foster a healthier and safer digital ecosystem for all users.

### Research Methodology

This study uses a normative legal approach, which is a legal research approach conducted by examining legal materials in the form of legislation, legal doctrines, court decisions, and relevant literature. This approach was chosen because the main objective of this study is to understand how the criminal law systems in Indonesia and South Korea regulate and protect victims of cyberbullying, based on the applicable positive legal provisions in both countries. The type of research used is comparative legal research, which involves comparing the legal regulations governing cyberbullying in Indonesia and South Korea and analyzing their strengths and weaknesses.

The data used in this research is secondary data, which includes primary legal materials such as laws, government regulations, and court decisions related to cyberbullying in both countries. Additionally, secondary legal materials such as books, journals, scientific articles, and news articles discussing the Kim Sae Ron case and the phenomenon of cyberbullying are also analyzed to enrich the research findings. Data collection techniques were carried out through library research, by collecting, reading, and recording various relevant legal sources and references.

Data analysis was conducted qualitatively, by describing, interpreting, and examining the contents of these legal materials in depth, then systematically comparing the legal systems in Indonesia and South Korea. From the analysis results, conclusions will be drawn regarding the effectiveness of legal protection for cyberbullying victims and recommendations that Indonesia can adopt to improve its legal system. With this method, it is hoped that the research will contribute scientifically to the development of criminal law in the digital age.

### Results and Discussion

Cyberbullying is a term that refers to acts of bullying, insults, harassment, or threats carried out through electronic media, such as social media, messaging applications, online forums, and other digital communication platforms. Cyberbullying involves the use of technology to intimidate, humiliate, or harm someone emotionally or socially. Unlike conventional bullying, cyberbullying can occur without spatial or temporal limitations, so victims can experience continuous psychological pressure. In a legal context, cyberbullying is considered an act that violates an individual's right to safety, honor, and personal integrity, which requires adequate legal protection.

Cyberbullying can take various forms, including: (1) the continuous sending of threatening or insulting messages, (2) the spread of rumors or slander through social media, (3) the uploading of photos or videos that humiliate the victim without permission, (4) the theft of online identity to damage the victim's reputation, and (5) social exclusion in the virtual world. Each form of cyberbullying has serious psychological impacts on the victim, such as anxiety, depression, and even suicidal thoughts. Due to its severe consequences, many countries have begun to regulate such actions within their criminal legal systems.

The effects of cyberbullying are not limited to emotional harm but can also lead to reputational damage, mental health issues, loss of employment opportunities, and social isolation. In some extreme cases, victims of cyberbullying experience such severe psychological pressure that it leads to suicide. This phenomenon underscores that cyberbullying is not a trivial matter but a serious crime that requires legal attention to ensure justice and protection for victims.

Given the complexity and harmful effects of cyberbullying, stringent legal regulations are an indispensable necessity. The law must be able to anticipate new forms of cyberbullying and provide a clear legal framework for law enforcement agencies to act. Additionally, specific regulations on cyberbullying can deter perpetrators, effectively protect victims, and promote the creation of a safer and healthier digital space for society. Therefore, many countries are beginning to formulate specific regulations regarding this cybercrime, including South Korea and Indonesia.

In international practice, several countries have strictly regulated cyberbullying. South Korea, for example, has specific laws regarding the use of information and communication networks that provide protection for victims and criminal penalties for perpetrators. On the other hand, countries like the United States also regulate cyberbullying through various state-specific regulations. Indonesia, through the ITE Law, regulates some aspects of cyberbullying, but not yet in a specific and comprehensive manner. By comparing these systems, the strengths and weaknesses of each legal framework can be identified, along with the steps needed to improve national regulations regarding protection for victims of cyberbullying.

In Indonesia, regulations on cyberbullying are still indirect and scattered across several more general regulations on cybercrime. One of the main legal bases used is Law No. 11 of 2008 on Electronic Information and Transactions (ITE Law) as amended by Law No. 19 of 2016. In this law, specifically Article 27(3), it is stated that it is prohibited to distribute, transmit, and/or make accessible electronic information containing defamation and/or slander.

Additionally, Article 29 of the ITE Law addresses threats of violence or intimidation through electronic media.

In addition to the ITE Law, there is also the Criminal Code (KUHP) that is relevant, particularly the provisions regarding defamation, slander, libel, and offensive behavior. Although the term “cyberbullying” is not explicitly mentioned, various acts of cyberbullying can be categorized under these provisions. The main issue in Indonesia's legal framework is the absence of specific regulations explicitly addressing cyberbullying, leaving legal interpretation dependent on analogies to general provisions.

In practice, enforcing the law against cyberbullying cases in Indonesia faces several challenges. One of the biggest challenges is the issue of proof, particularly regarding the identification of perpetrators in the online world, who often use fake identities or anonymous accounts. Additionally, law enforcement agencies are still limited in their technical capabilities to investigate cybercrime cases.

According to data from the Cybercrime Directorate of the National Police's Criminal Investigation Department, cases involving defamation and slander through electronic media show an increasing trend each year. However, most of the cases processed involve public figures or cases that have garnered widespread public attention. This indicates that there is still a disparity in the enforcement of laws regarding cyberbullying cases. [Taufik Rahman, *Cyber Crime and Its Enforcement in Indonesia*, Bandung: Refika Aditama, 2018.]

Institutions such as the National Commission for Child Protection (KPAI) and other non-governmental organizations are also active in pushing for regulatory improvements and raising public awareness about the dangers of cyberbullying. Preventive measures in the form of digital education have also begun to be developed, although they are not yet evenly distributed throughout Indonesia.

South Korea is known as one of the countries with strict regulations against cybercrime, including cyberbullying. Legal provisions regarding cyberbullying are regulated through several specific laws, including the “Act on Promotion of Information and Communications Network Utilization and Information Protection” (Network Act) and the “Act on Punishment of Sexual Crimes and Protection of Victims.”

Under the Network Act (South Korean Criminal Code), Article 307 on Defamation and Article 311 on Insult, the dissemination of false information, insults, defamation, and intimidation through electronic media are specifically regulated with significant criminal penalties. Additionally, in certain cases where the victim suffers severe psychological distress leading to suicide, the perpetrator may face severe criminal penalties, including charges based on negligence causing death.

South Korea also imposes an obligation on digital platforms to remove problematic content within a certain period after receiving a report, as well as providing a complaint service for victims of cyberbullying. This demonstrates that regulations in South Korea are not only focused on repressive aspects but also on preventive measures and victim protection.

The enforcement of laws against cyberbullying in South Korea is quite effective, supported by a responsive legal system and advanced investigative technology. The South Korean police have a special cybercrime unit that handles

cases occurring in the virtual world, including cyberbullying cases. [Yung Wook Jo, “Cyberbullying and Legal Responses in Korea,” *Journal of Korean Law*, Vol. 13, No. 2, 2014.]

Cyberbullying cases involving South Korean celebrities such as Sulli and Goo Hara prompted the government to tighten regulations related to hate speech and cyberbullying. This has led to social changes where the public has become more aware of the impact of bullying behavior in the virtual world. The government also encourages digital platform companies to take proactive steps to minimize the spread of harmful content.

Additionally, South Korea has rehabilitation and psychological support programs for cyberbullying victims, integrated with national mental health policies. Thus, South Korea's approach to cyberbullying is not only repressive through law enforcement but also comprehensive, considering victim rehabilitation and public education.

Indonesia and South Korea both recognize the importance of legal protection for victims of cyberbullying. Both countries have regulated this issue within their national legal systems, albeit with different approaches. In Indonesia, regulations on cyberbullying are scattered across several laws, such as Law No. 11 of 2008 on Information and Electronic Transactions (ITE Law) as amended by Law No. 19 of 2016. Article 27(3) of the ITE Law addresses defamation and/or slander through electronic media. South Korea also has similar regulations, particularly through the “Act on Promotion of Information and Communications Network Utilization and Information Protection” (Network Act) and the South Korean “Criminal Act,” which address defamation, slander, and violence based on electronic media.

Another similarity lies in the efforts of both countries to emphasize the importance of protecting victims. In both Indonesia and South Korea, victims of cyberbullying can file reports with the authorities to obtain legal protection and prosecute perpetrators through criminal channels. Additionally, both countries emphasize the importance of balancing freedom of expression with the protection of individual dignity.

In terms of prevention, both Indonesia and South Korea have taken preventive measures by promoting digital education and public awareness campaigns on the negative impacts of cyberbullying. Governments and various civil society organizations in both countries actively educate the public, especially the younger generation, to be more prudent in using social media.

Despite these similarities, there are also significant differences in the legal approaches of Indonesia and South Korea regarding cyberbullying. First, in terms of regulation, South Korea's legal system tends to be more detailed and specific in regulating forms of cyberbullying. South Korea even has a special task force under the National Police Agency that handles cybercrime cases, including cyberbullying. [Republic of Korea, Act on Promotion of Information and Communications Network Utilization and Information Protection, etc. (Network Act), Articles 44-7.] Meanwhile, in Indonesia, although there is already a cybercrime unit within the police force, the specifics regarding cyberbullying are still mixed in with more general rules on defamation and insult.



The second difference lies in the burden of proof and protection for victims. In South Korea, victims of cyberbullying are better protected through swift legal procedures and efforts to reduce victim trauma, including confidential investigations and closed trials for certain cases. In Indonesia, legal procedures tend to be more formalistic and can take a long time, which sometimes exacerbates the psychological condition of victims.

Third, South Korea imposes heavier penalties on perpetrators of cyberbullying, especially if their actions cause serious mental distress or suicide in victims. Cases such as the deaths of South Korean artists due to cyberbullying (e.g., the cases of Sulli and Goo Hara) have prompted the South Korean government to tighten regulations and increase penalties for perpetrators. Meanwhile, in Indonesia, criminal penalties for defamation or insults in cyberspace are relatively light, with a maximum prison sentence of four years and/or a maximum fine of Rp750 million. [National Police Agency of Korea, "Cyber Bureau," accessed 2025.]

In addition, South Korea also pays great attention to the responsibility of social media platforms in preventing and combating cyberbullying, including the obligation to quickly remove harmful content. In Indonesia, although there are regulations regarding electronic system operators, their implementation is still ineffective.

In the context of the Kim Sae Ron case, who experienced cyberbullying after being involved in a legal case, a comparison between the legal systems of Indonesia and South Korea provides an important insight into the effectiveness of victim protection. In South Korea, despite more advanced regulations, the Kim Sae Ron case demonstrates that social and cultural pressures on the internet remain strong, leaving cyberbullying victims, including celebrities, vulnerable to online attacks.

The handling of cyberbullying in this case highlights the importance of a more responsive victim protection system. Looking at South Korea's approach, efforts such as rapid reporting, removal of harmful content, and protection of victims' privacy have been implemented. However, their effectiveness remains debatable, as public pressure on social media often moves faster than formal legal processes.

If a similar case were to occur in Indonesia, its handling might face greater challenges, given the lack of specific regulations governing cyberbullying and the slow pace of legal processes. Without mechanisms for quickly removing harmful content and providing psychological protection for victims, the impact on victims could be more severe.

Another implication is the need to learn from South Korea's system in developing an effective online reporting system and strengthening the role of digital platforms in preventing and handling cyberbullying. Indonesia needs to develop policies that not only focus on punishing perpetrators but also provide comprehensive support for victims, including counseling, psychological recovery, and swift legal protection.

Thus, the case of Kim Sae Ron can serve as a mirror for Indonesia to improve its legal system, particularly in protecting victims of cyberbullying. A more holistic approach, combining criminal law, personal data protection, public education, and the involvement of digital platforms, is essential to optimize protection for victims of cyberbullying.

When evaluating the effectiveness of legal regulations on cyberbullying in Indonesia and South Korea, there are several important aspects that need to be considered. In Indonesia, legal regulations on cyberbullying are still scattered across various regulations, the main one being Law No. 19 of 2016 amending Law No. 11 of 2008 on Information and Electronic Transactions (ITE Law) [1]. However, the ITE Law does not explicitly use the term "cyberbullying," but rather regulates forms of conduct that can be categorized as cyberbullying, such as defamation, insult, or threats through electronic media. This indicates a weakness in the normative aspect, as the lack of a clear definition leaves enforcement dependent on the interpretation of law enforcement officials.

On the other hand, South Korea has more structured regulations, such as the Network Act and provisions in the Criminal Act that more specifically regulate defamation and slander in cyberspace [2]. The country has also established a special unit within the National Police to handle cybercrime, which speeds up the investigation and handling of cyberbullying cases. The main strength of South Korea's legal system lies in its swift procedures, protection of victims' privacy, and the imposition of severe penalties on perpetrators, especially if cyberbullying causes severe psychological trauma or the death of the victim.

However, South Korea's regulatory strength still faces challenges, particularly in keeping pace with the rapid flow of information on social media. Cases such as that experienced by Kim Sae Ron show that even though the law is in place, pressure from the public and online media can move faster and be more intense than formal legal protection.

In contrast, in Indonesia, the effectiveness of legal regulations is limited not only by unclear regulations but also by weak implementation. Law enforcement agencies often respond slowly to reports of cyberbullying, and complicated legal procedures prolong the suffering of victims. Weak digital literacy among the public also exacerbates the situation, as victims often do not know how to report incidents or seek legal assistance.

Thus, it can be concluded that South Korea is superior in terms of regulation and protection mechanisms, but still faces challenges from an aggressive online culture. Indonesia needs to improve both normative and implementation aspects simultaneously to achieve effective legal protection for victims of cyberbullying.

Based on the above evaluation and lessons learned from the Kim Sae Ron case in South Korea, there are several policy recommendations that the Indonesian government should consider to strengthen legal protection for cyberbullying victims. First, revisions to the ITE Law are needed to explicitly include the term and definition of cyberbullying. This definition is important to provide legal clarity and avoid multiple interpretations in law enforcement.

Additionally, the types of cyberbullying, such as body shaming, doxing, flaming, and others, should be regulated in greater detail. Second, a specialized unit under the Indonesian Police should be established to handle cyberbullying cases professionally and efficiently. This unit should be supported by specialized training on cybercrime and victim psychology, as well as equipped with adequate digital infrastructure for investigations. Third, Indonesia needs to adopt strict privacy protection mechanisms for victims. This can be achieved by establishing confidential

investigation procedures and closed-door trials for certain cyberbullying cases.

The aim is to reduce the risk of ongoing trauma for victims. Fourth, cooperation with social media platforms must be improved. The government needs to encourage the creation of regulations that require platforms to respond to reports of harmful content within a certain time frame, for example 24 hours, and to provide a special reporting channel for serious cases. Fifth, digital education must become a national program. The government, together with educational institutions and civil society organizations, needs to develop a digital literacy curriculum that addresses social media ethics, the legal consequences of cyberbullying, and the importance of respecting the human rights of others in the virtual world. Sixth, free psychological counseling services need to be provided for victims of cyberbullying. These services can be facilitated by local governments through collaboration with hospitals, community health centers, or integrated service centers for the protection of women and children. Seventh, Indonesia needs to build an online reporting system that is integrated with the police. This system must be user-friendly, fast, and secure, so that victims can report cases without fear or shame.

With the implementation of these recommendations, it is hoped that Indonesia can improve its legal protection system for victims of cyberbullying. The case of Kim Sae Ron highlights the importance of swift action and comprehensive protection, not only from law enforcement but also from society and digital platforms. Indonesia must learn from this experience to build a more just and humane system for victims of cybercrime.

Kim Sae Ron, a young South Korean actress, faced a wave of cyberbullying after being involved in a drunk driving incident in May 2022. This incident caused widespread condemnation from the South Korean public, especially on social media. Since then, Kim Sae Ron's social media accounts have been the target of hate speech, insults, threats, and the dissemination of personal information or doxing. Many comments not only criticized Kim's mistake but also attacked her personal life, family, and past.

The wave of online attacks took various forms, ranging from insulting memes, boycott campaigns against the films or dramas she starred in, to the spread of false rumors about her personal life. Major social media platforms such as Instagram, Twitter, and Facebook have become the primary venues for the spread of cyberbullying content targeting Kim Sae Ron. Additionally, some unverified online news reports have exacerbated the situation by publishing stories that further tarnish Kim's public image. [Soompi, "Kim Sae Ron Apologizes For DUI Incident," accessed 2022.]

In the months following the incident, the mental pressure Kim Sae Ron faced increased dramatically. She was reported to be suffering from severe stress and had to reduce her public activities. Some media reports stated that the actress had received psychological treatment due to the intense pressure from the online attacks. [Korea JoongAng Daily, "Public Outrage Against Kim Sae Ron's Drunk Driving Incident Spills Over Online," 2022.]

Legal action began when Kim Sae Ron's management, Gold Medalist Entertainment, announced that they would take legal action against those who spread slander, insults, and threats against their artist. This step shows that Kim Sae Ron is not only focused on resolving the legal issues related to the DUI incident, but is also trying to protect her rights as

a victim of cyberbullying. Kim Facing massive attacks online, Kim Sae Ron through her agency took legal action to protect herself. Gold Medalist Entertainment issued an official statement in mid-2022 confirming that they would take legal action against individuals who have committed insults, slander, spread false information, and violated Kim Sae Ron's privacy. [The Korea Herald, "Kim Sae Ron Reportedly Undergoing Psychological Treatment Following Online Harassment," 2022.]

In the South Korean legal system, insults (Article 311 of the Criminal Act) and defamation, whether committed online or offline (Article 307 of the Criminal Act), are criminal acts that can be prosecuted through legal channels. In addition, South Korea has the "Act on Promotion of Information and Communications Network Utilization and Information Protection" (Network Act) which more specifically regulates cyber defamation and allows victims to request the removal of harmful content and sue perpetrators criminally or civilly. [Gold Medalist Entertainment Official Statement, "Legal Action Against Cyberbullies," 2022.]

Lawyers appointed by Gold Medalist Entertainment began collecting evidence from various online platforms, including screenshots of comments, insulting posts, and threatening messages received by Kim Sae Ron. This evidence was then submitted to the police as part of a criminal report against the perpetrators of cyberbullying.

In addition to the criminal report, the agency also submitted a request to remove harmful content to the operators of the digital platforms. In South Korea, regulations require platforms to follow up on reports of violations of personal rights within a certain period of time, usually within 24 to 48 hours. This expedites the removal of harmful content and protects victims from further impact.

The legal process carried out by Kim Sae Ron took place in several stages: starting from the police investigation of the identified accounts, to the transfer of the case files to the prosecutor's office. Several perpetrators of cyberbullying are known to have been sentenced to fines and the obligation to apologize to Kim Sae Ron.

This legal step is not only intended to provide justice for Kim Sae Ron, but also to provide a deterrent effect to society to be more responsible in using social media. By taking legal action, Kim Sae Ron shows that victims of cyberbullying have the rights and mechanisms to protect themselves legally.

In analyzing the legal protection received by Kim Sae Ron, it can be concluded that the South Korean legal system is quite responsive in handling cyberbullying cases. Adequate substantive law, supported by a fast reporting mechanism, provides relatively effective protection for victims.

One of the main strengths of the South Korean legal system is the existence of a special police unit that handles cybercrime. This unit allows the investigation process to run faster and more professionally compared to general investigations. In addition, regulations that require digital platforms to act quickly in removing harmful content minimize the long-term impact on victims.

However, there are several shortcomings that are visible in the handling of the Kim Sae Ron case. First, even though the perpetrators of cyberbullying are prosecuted, the legal process still takes quite a long time to reach a final verdict. Second, there is inequality in the effectiveness of content removal across platforms. Not all international platforms respond as quickly as local South Korean platforms.

This case also shows that social and media pressure can be faster and more severe than the legal process. Although legal action was taken, the reputational damage and psychological trauma experienced by Kim Sae Ron had occurred before a court decision was made.

If Kim Sae Ron's case had happened in Indonesia, the challenges would likely have been greater. In Indonesia, legal regulations related to cyberbullying are still not specific. The ITE Law does regulate insults and defamation, but its implementation is often disputed and does not focus on protecting victims. In addition, the absence of a special police unit for cybercrime causes the handling of cyberbullying reports to be slow. Digital platforms are also not legally required to respond quickly to reports of harmful content. [Republic of Korea, Act on Promotion of Information and Communications Network Utilization and Information Protection (Network Act), 2001.]

On the other hand, the strong culture of victim-blaming in Indonesia also burdens victims. Kim Sae Ron in South Korea actively received legal support from her agency, while in Indonesia, many cyberbullying victims have to fight alone without institutional support. [Korean Communications Commission, "Regulation on the Protection of Online Users' Rights," 2021.]

Through Kim Sae Ron's case, it can be understood that legal protection for cyberbullying victims must include three important things: clear and specific regulations, fast and professional handling mechanisms, and strong social support for victims. South Korea has shown progress in all three aspects, although improvements are still needed to reduce the tremendous social pressure on victims.

Indonesia can learn important lessons from this case to improve the legal protection system for victims of cyberbullying. The efforts needed include regulatory updates, the establishment of a special cybercrime unit in the police, public education about the dangers of cyberbullying, and encouraging digital platforms to be more responsible in protecting users.

## Conclusion

Based on the results of the discussions that have been carried out in the previous chapters, it can be concluded that legal protection for victims of cyberbullying in both Indonesia and South Korea has different characteristics, with their respective advantages and disadvantages.

In terms of legal regulations, South Korea has more specific and comprehensive regulations regarding cyberbullying. These regulations include the criminalization of insults and defamation in cyberspace through the "Act on Promotion of Information and Communications Network Utilization and Information Protection" as well as support for mechanisms for removing harmful content quickly. In contrast, Indonesia still relies on general provisions in the Electronic Information and Transactions Law (UU ITE) and the Criminal Code which do not explicitly regulate cyberbullying as a separate criminal act.

Evaluation of the effectiveness of legal protection shows that the South Korean system is more effective in providing protection to victims. This is indicated by the rapid steps in removing harmful content, special investigations by the cybercrime unit, and the existence of real law enforcement against perpetrators. However, there are still challenges, such as massive social pressure on victims before the legal process is completed. Meanwhile, in Indonesia, although there have been efforts to enforce the law against

cyberbullying cases, the process is still slow, less focused on victims, and tends to be oriented towards punishment which sometimes ignores the rehabilitation aspect for victims.

In the Kim Sae Ron case study, it can be seen that the legal regulations in South Korea are able to provide a fairly effective response to cyberbullying attacks. The legal steps taken, both in the form of criminal reports and requests for content removal, have resulted in protecting Kim Sae Ron's rights as a victim. However, the psychological and social damage caused by cyberbullying remains a serious problem that cannot be fully addressed by formal legal mechanisms. Based on the comparison, recommendations for Indonesia include the need for regulatory updates to cover cyberbullying more specifically, the establishment of a competent cybercrime unit, increased cooperation with digital platforms to accelerate the removal of harmful content, and strengthening public education to prevent and handle cyberbullying. Lessons learned from the Kim Sae Ron case also emphasize the importance of institutional support for victims, including psychological support services.

Thus, legal protection efforts for victims of cyberbullying must be comprehensive, covering aspects of regulation, law enforcement, and social and psychological support for victims. Such protection must ensure that victims not only obtain legal justice, but can also recover and reintegrate into their social lives.

Based on the results of the analysis and conclusions above, the author provides several academic and practical suggestions that are expected to increase the effectiveness of legal protection for victims of cyberbullying in Indonesia.

### 1. Recommendations for Policymakers

- **Regulatory Updates:** The Indonesian government needs to update the ITE Law by including specific provisions on cyberbullying. The definition, form, and protection mechanism for victims need to be formulated clearly to avoid multiple interpretations and ensure a focus on victim protection.
- **Strengthening Complementary Laws:** In addition to the ITE Law, derivative rules or government regulations need to be created that regulate the mechanism for quickly removing harmful content and procedures for resolving cyber disputes.
- **Establishment of a Special Cybercrime Unit:** The police must strengthen cybercrime units with special training, adequate human resources, and the latest digital investigation equipment.

### 2. Recommendations for Law Enforcement Officials

- **Capacity Building:** Law enforcement officials must be specially trained in handling cyberbullying cases, including understanding the psychological dynamics of victims and digital investigation techniques.
- **Victim-Based Approach:** Handling cyberbullying cases must focus on victim recovery, not solely on punishing the perpetrator. Officials must pay attention to the psychological needs of victims and provide protection against the risk of re-victimization.

### 3. Recommendations for Social Media Platforms

- **Increased Responsibility:** Digital platforms must implement policies to remove harmful content quickly

and transparently. Reporting mechanisms must be made easily accessible, responsive, and provide adequate feedback to reporters.

- **Cooperation with the Government:** Platforms need to collaborate with national authorities to share information for law enforcement against cyberbullying perpetrators.
- 4. Recommendations for the General Public**
- **Increased Digital Literacy:** The public needs to be educated about social media ethics, the dangers of cyberbullying, and the importance of respecting the rights of others in cyberspace.
  - **Support for Victims:** The public must change the culture of victim-blaming and start providing support to victims. This can be done through awareness campaigns, public education, and creating a safer and more supportive online environment.
- 5. Recommendations for the Academic World**
- **Further Research:** More empirical research is needed on the phenomenon of cyberbullying in Indonesia to understand the patterns, impacts, and effectiveness of legal and social interventions.
  - **Development of Intervention Models:** The academic world can contribute to developing multi-level intervention models that include legal, psychological, and social aspects in dealing with cyberbullying.

With the implementation of these suggestions, it is hoped that legal protection for victims of cyberbullying in Indonesia can be more effective, responsive, and humane. Cases such as that experienced by Kim Sae Ron can be an important mirror for Indonesia to improve legal protection mechanisms and strengthen a healthy and responsible online culture.

## References

1. Aditya Y. *Cyber Law: Theory and Practice in Indonesia*. Jakarta: Kencana Prenadamedia Group, 2021.
2. Ahmad N. Legal Protection for Victims of Cyberbullying in Indonesia. *Journal of Law and Development*,2020:50(3):515–534.
3. Alamsyah R. *Cyberbullying: Impact Regulation and Solutions*. Bandung: Refika Aditama, 2019.
4. Anderson KE. Social Media Use and Cyberbullying: A Review. *Aggression and Violent Behavior*,2017:34:1–7.
5. Anwar Y. *Protection of Cyber Crime Victims*. Malang: Intrans Publishing, 2022.
6. Barlett CP Coyne SM. A Meta-Analysis of Sex Differences in Cyber-Bullying Behavior. *Journal of Aggression Conflict and Peace Research*,2014:6(3):155–163.
7. Choi SB Lee H. Cyberbullying in South Korea: Laws and Responses. *International Journal of Cyber Criminology*,2017:11(1):98–109.
8. Farida A. *Personal Data Protection Law and Cyberbullying*. Yogyakarta: Student Library, 2021.
9. Hinduja S Patchin JW. *Bullying Beyond the Schoolyard: Preventing and Responding to Cyberbullying* (2nd ed.). Thousand Oaks: Sage Publications, 2015.
10. Huda N. *Human Rights Law in National and International Legal Systems*. Jakarta: Rajawali Pers, 2018.
11. Indrawati S. Restorative Justice Approach in Handling Cyberbullying Cases. *Jurnal Restorative Justice*,2020:2(1):55–72.
12. Kim JW Lee YS. Effectiveness of Korean Cyberbullying Law Enforcement. *Asian Journal of Criminology*,2020:15(2):87–101.
13. Kusuma A. *Criminal Law and Cyberlaw in Indonesia*. Jakarta: Sinar Grafika, 2021.
14. Nasution A. *Cybercrime and Victim Protection in the Perspective of Indonesian Criminal Law*. Medan: USU Press, 2019.
15. Nugroho A. The Urgency of Cyberbullying Regulation in Indonesian Criminal Law. *Journal of Law*,2018:7(2):233–248.
16. Park S Na E Kim E. The Relationship between Cyberbullying Victimization and Depression among Korean Adolescents. *Computers in Human Behavior*,2014:38:232–238.
17. Patchin JW Hinduja S. The Nature and Extent of Cyberbullying Among Middle and High School Students. *Archives of Suicide Research*,2018:22(2):201–215.
18. Pratama R. *Cybercrime and Indonesian Criminal Law*. Jakarta: Prenadamedia Group, 2020.
19. Sukmana R. *Legal Aspects in Cyberspace*. Bandung: Nuansa Cendekia, 2017.
20. Yoon J Bauman S. Cyberbullying in South Korea: Analysis of Public Response and Policy Development. *Journal of School Violence*,2014:13(4):425–442.