



Department of
Justice

An Roinn Dlí agus Cirt

Männystrie O tha Laa

www.justice-ni.gov.uk

Consultation on Proposals to Criminalise Sexually Explicit Deepfake Images

RESPONSE FORM

RESPONDING TO THIS CONSULTATION

The Department of Justice is seeking views on proposals to criminalise sexually explicit deepfake images.

Please use this form to provide your response, and once completed send by **email** to: CPU@justice-ni.gov.uk or by **post** to:

Department of Justice
Criminal Policy Unit
Knockview Buildings
Stormont Estate
Belfast
BT4 3SJ

Additional pages may be submitted if required.

Responses should be submitted by **11:59pm on the closing date of 6 October 2025.**

ABOUT YOU

Please provide your name and details in this section.

All information will be handled in accordance with the General Data Protection Regulation (GDPR)

I am responding as... *(Please choose one option only)*

☐ A member of the public (please indicate if you are content for your name to be shared)

☒ On behalf of an organisation

☐ Other.....*(Please specify)*

Name:	Liz Arthur
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The Department is seeking your views on the following questions

Questions 1 to 6 relate to Chapter 4 of the consultation: Proposals to make it an offence to create, or request the creation of, a sexually explicit deepfake image

Q.1 Do you agree with the proposal to legislate to criminalise the creation, or requesting the creation, of a sexually explicit deepfake image, without the consent of the person depicted in the image, or a reasonable belief in their consent, with the intention of causing humiliation, alarm or distress to the person depicted in the image?

☒ Yes

☐ No

Q.2 Do you agree with the proposal to legislate to criminalise the creation, or requesting the creation of, a sexually explicit deepfake image, without the consent of the person to be depicted in the image, or a reasonable belief in their consent, for the purposes of sexual gratification?

☒ Yes

☐ No

Q.3 Do you agree with the proposal that the creation, and requesting the creation, of sexually explicit deepfake images should be hybrid offences?

☒ Yes

☐ No

Q.4 Do you agree with the inclusion of motivations in the offences, bearing in mind that where the offence is proved to have been committed for the purposes of sexual gratification, the offender will be subject to risk management measures such as the sex offender notification requirements?

☒ Yes

☐ No

Q.5 Do you agree with the proposal to include the element of recklessness in the offences?

☒ Yes

☐ No

Q.6 Do you agree with the penalties proposed for the offences which are:

- on summary conviction, imprisonment for a term not exceeding six months-or a fine not exceeding the statutory maximum, or both;
- on conviction on indictment, imprisonment for a term not exceeding two years.

☒ Yes

☐ No

If you have answered 'No' to any of the questions above, please provide some details below on the reasons why you do not support the proposal/s.

Questions 7 to 14 relate to Chapter 5 of the consultation: proposals to make it an offence to share, or threaten to share, a sexually explicit deepfake image

Q.7 Do you agree with the proposal to legislate to criminalise intentionally sharing a sexually explicit deepfake image without consent, or a reasonable belief in consent, with the intention of causing humiliation, alarm or distress to the person depicted in the image?

☒ Yes

☐ No

Q.8 Do you agree with the proposal to legislate to criminalise intentionally sharing a sexually explicit deepfake image without consent, or a reasonable belief in consent, for the purposes of sexual gratification?

☒ Yes

☐ No

Q.9 Do you agree with the inclusion of motivations in these offences, bearing in mind that where the offence is proved to have been committed for the purposes of sexual gratification, the offender will be subject to risk management measures such as the sex offender notification requirements?

☒ Yes

☐ No

Q.10 Do you agree with the proposal to legislate to criminalise threatening to share a sexually explicit deepfake image?

☒ Yes

☐ No

Q.11 Do you agree with the proposal to include the intention to cause fear or distress in this offence?

☒ Yes

☐ No

Q.12 Do you agree with the proposal to include a recklessness element in the offences?

☒ Yes

☐ No

Q.13 Do you agree with the proposal that these should be hybrid offences?

☒ Yes

☐ No

Q.14 Do you agree with the penalties proposed for the offences which are:

- on summary conviction, imprisonment for a term not exceeding six months, or a fine not exceeding the statutory maximum, or both;
- on conviction on indictment, imprisonment for a term not exceeding two years.

☒ Yes

☐ No

If you have answered 'No' to any of the questions above, please provide some details on the reasons why you do not support the proposal/s.

Question 15 relates to Chapter 7 of the Consultation: Definition of sexually explicit deepfake images for the purposes of the proposed offences

Q.15 Please provide details of any aspects of sexually explicit deepfake images that you think should be captured within the definition.

- The person is engaging in an act which a reasonable person would consider to be a sexual act;
- The person's genitals, buttocks and/or breasts are exposed or covered by underwear;
- The person is engaged in an act of urination or defecation;
- The person is engaging in an act not ordinarily done in public.