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Cross-Continental Study of English-Speaking Nations

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Table of contents

Zusammenfassung (Deutsch)	1
Abstract (English)	2
Introduction	3
Literature Review	5
Media Representations of Sexual Violence	5
Print Media Coverage in Singapore	8
Print Media Coverage in South Africa	8
Print Media Coverage in England	9
Print Media Coverage in the USA	10
Print Media Coverage in Australia	11
Comparative Themes Across Countries	12
Framing Sexual Violence: Linguistic Categories in Media Discourse	13
Naming and Responsibility	13
Framing and Emotional Impact	14
Structural Positioning and Ideology	15
Media guidelines, ethical standards and regulatory bodies	16
Singapore: Media Control and Ethical Constraints	18
South Africa: Freedom of the Press Amid Ethical Challenges	19
England: Ethical Reforms and Regulatory Oversight	19
United States: First Amendment Protections and Ethical Challenges	20
Australia: Self-Regulation and Defamation Concerns	21
Methodology	21
Research Design	21

Data Collection	22
Sample	22
Keyword Dictionary	23
Analytical Techniques	24
Keyword Frequency (RQ1)	24
Sentiment analysis (RQ1)	24
Qualitative Contextual Analysis (RQ2)	24
Ethical consideration	25
Validation check	25
Findings	26
Sample	26
Research Question 1: Salient Topics in Media Coverage and Geographic Variations	26
Keyword Analysis	26
Statistical differences across countries	30
Sentiment Analysis	31
Research Question 2: Media regulation and the reporting environment	32
Discussion	34
Unexpected Patterns and Implications	37
Limitations	38
Implications and Recommendations	38
References	39
Appendix	55

Zusammenfassung (Deutsch)

Sexuelle Gewalt gegen Frauen bleibt ein weltweit drängendes Problem und die Medien spielen eine Schlüsselrolle dabei, das öffentliche Verständnis dafür zu prägen. Dennoch wissen wir bislang nur wenig darüber, wie sich mediale Darstellungen in verschiedenen nationalen Zusammenhängen unterscheiden oder wie rechtliche und regulatorische Rahmenbedingungen die Berichterstattung beeinflussen – beides hat erhebliche Auswirkungen auf den öffentlichen Diskurs und die institutionelle Verantwortlichkeit. Diese Studie schließt diese Lücke, indem sie untersucht, wie Printmedien in Singapur, Südafrika, England, den Vereinigten Staaten und Australien sexuelle Gewalt darstellen. Auf der Grundlage eines Mixed-Methods-Ansatzes kombiniert die Forschung konzeptgeleitete Schlüsselwortanalysen, Sentimentanalysen und Topic Modeling, um eine stratifizierte Stichprobe von Nachrichtenartikeln auszuwerten. Die Ergebnisse zeigen deutliche länderübergreifende Unterschiede in Tonfall, Framing und Sprache: Während US-amerikanische und südafrikanische Medien häufig auf sensationsorientierte oder opferbeschuldigende Erzählungen zurückgreifen, verwenden Australien und Singapur häufiger eine empathisch geprägte Sprache, die jedoch oft frei von systemischer Kritik bleibt. Diese Befunde belegen, dass Medienregulierung und ethische Rahmenbedingungen journalistische Normen stark prägen und damit darüber entscheiden, ob Berichterstattung Stigmatisierung verstärkt oder Verantwortlichkeit fördert. Diese Studie trägt zu den laufenden Debatten über Medienethik, institutionelle Macht und Geschlechtergerechtigkeit bei und unterstreicht den Bedarf an kohärenteren, systemischen Ansätzen für die Berichterstattung über sexuelle Gewalt.

Schlüsselwörter: sexuelle Gewalt, Medienframing, Vergleichsstudien, Regulierungsrahmen, Geschlechterrepräsentation

Abstract (English)

Sexual violence against women remains a globally urgent issue, and the media play a key role in shaping public understanding of it. However, we know relatively little about how media representations vary across national contexts or how legal and regulatory frameworks influence reporting practices, both of which have significant implications for public discourse and institutional accountability. This study addresses that gap by analyzing how print media in Singapore, South Africa, England, the United States and Australia frame sexual violence. Drawing on a mixed-methods approach, the research combines concept-driven keyword analysis, sentiment analysis, and topic modeling to examine a stratified sample of news articles. The findings reveal marked cross-national variation in tone, framing, and language: while U.S. and South African media tend to rely on sensational or victim-blaming narratives, Australia and Singapore display higher rates of empathy-driven language, though often stripped of systemic critique. These results show that media regulation and ethical frameworks strongly shape journalistic norms, affecting whether coverage reinforces stigma or promotes accountability. The study contributes to ongoing debates about media ethics, institutional power, and gender justice, highlighting the need for more consistent, systemic approaches to reporting on sexual violence.

Keywords: sexual violence, media framing, comparative studies, regulatory framework, gender representation

Introduction

"The first assault is the act itself. The second is how society responds." – *Jessica Valenti, Sex Object* (2016)

One out of three (35%) women globally have experienced a form of sexual violence (WHO, 2021). Sexual violence targeting women has increasingly been acknowledged as a significant violation of human rights, carrying profound consequences for both individuals and broader society (Abrahams et al., 2014). Despite efforts by international frameworks such as the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW, 1979), this type of violence continues to be deeply rooted in institutional structures and prevailing social norms (Monckton Smith, 2021). To fully grasp the scope and significance of this issue, it is important to define what is meant by gender-based violence and how it manifests across different contexts. The UNHCR (2020) refers to this type of violence as harmful actions aimed at individuals because of their gender, with women being disproportionately impacted as a result of longstanding structural and historical inequalities. It includes physical, psychological and sexual harm and is often stemming from power imbalances that are perpetuated by societal norms and institutional structures (García-Moreno et al., 2014). Sexual violence is specifically defined as any sexual act, attempt to commit such an act, unwelcome sexual remarks or advances, or actions that exploit a person's sexuality through coercion, regardless of the perpetrator's relationship to the victim (WHO, 2014). It is important to recognize that cultural differences hinder the establishment of a universally consistent definition, which in turn complicates the identification, prosecution, and prevention of such acts (UN Women, 2015). The lack of conceptual clarity, coupled with deeply entrenched cultural norms, presents major challenges to effectively addressing gender-based violence on a global scale.

The media play a pivotal role in shaping public narratives around sexual violence against women, serving as one of the main ways through which individuals encounter and interpret this issue. Media coverage shapes how the public understands responsibility, and plays a role in shaping the public's perception of victims in cases of sexual violence (Hall, 2007; Oliver et al., 2019). For example, the way sexual violence is portrayed in the media, whether as individual incidents or as part of a larger systemic issue, can significantly influence public conversations and shape policy decisions. (Easteal et al., 2015; Flood & Pease, 2009). With this in mind, media representations of sexual violence against women have long been a focal point in media research, often centered on high-profile case studies that have attracted substantial public attention. (Meyers, 1997). Even though the research on media portrayals of sexual violence within national contexts has expanded in recent years (Jewkes, 2004; Mendes et al., 2018), there remains a relative scarcity of studies employing mixed-method or computational approaches, particularly those that conduct cross-national comparisons between media systems in the Global North and South. Some studies (Cuklanz, 2000; Serisier, 2018) remain focused on specific national or social frameworks, limiting our understanding of how media framing of sexual violence operates on a global scale. Although some comparative research has been conducted, there is a notable lack of studies that systematically explore the relationship between institutional and legal media constraints and the framing of sexual violence across both Western and non-Western democracies using computational approaches. This study responds to that methodological and geographic gap by examining how sexual violence against women is portrayed in print media in five English-speaking countries: Singapore, South Africa, England, the USA, and Australia. These countries offer diverse perspectives due to their differing cultures, societies and legal systems. Taking that into consideration, the overarching research question of this thesis is: *How is sexual violence against women represented in print media across different national contexts?*

To address this, the study uses automated text analysis to compare media reporting styles across these regions, focusing on narrative framing and portrayal techniques alongside a qualitative approach that examines the broader context, including legislative media supervision and ethical guidelines. This approach takes into consideration broader circumstances surrounding print media coverage of sexual violence against women.

The findings are expected to show how media practices either perpetuate or challenge harmful stereotypes and social norms, while revealing how national cultures, legal frameworks and media standards influence reporting. This study contributes to media and gender studies by offering a comparative framework, and it supports more responsible journalistic practices and public discourse on sexual violence. Ultimately, this thesis argues that cross-cultural differences in media portrayals of sexual violence shape public understanding and have substantial consequences for advocacy, policy, and prevention efforts.

Literature review

The way sexual violence is represented in the press differs significantly between countries, shaped by varying cultural values, legal structures, and media institutions (Cuklanz & Moorti, 2009). This literature review explores the ways in which sexual violence is represented in the media, focusing on recurring themes such as victim-blaming, racialized narratives, sensationalist coverage, and the tendency to overlook structural factors. It also examines how broader cultural and institutional forces shape journalistic practices and influence public perceptions of sexual violence.

Media Representations of Sexual Violence

Research on media portrayals of sexual violence consistently highlights the media's influential role in shaping public perception and societal reactions (Oladimeji & Osunkunle,

2023). While early work (Tuchman, 1978) emphasized how newsrooms contribute to the social construction of issues, more recent studies have identified both damaging and constructive narrative practices. For example, news coverage can perpetuate harmful stereotypes through selective and dramatized storytelling (Easteal et al., 2015), whereas some reporting challenges dominant myths by foregrounding survivor perspectives (Flood & Pease, 2009).

A recurring pattern in media coverage is the tendency toward victim blaming, often manifested through subtle cues such as references to a victim's behavior or appearance, which may implicitly shift responsibility (Franiuk et al., 2008). In an analysis of the Kobe Bryant sexual violence case, it was found that 65% of media articles adopted such framing, reinforcing problematic public attitudes (Franiuk et al., 2008). Yet, other research also suggests that the prevalence and form of victim-blaming narratives vary across cultural and editorial settings (Cuklanz & Moorti, 2009), highlighting the importance of comparative inquiry.

Episodic framing remains the dominant approach in reporting on sexual violence, emphasizing isolated events while neglecting the broader societal and structural context (Carlyle et al., 2008). This narrow lens can obscure underlying issues such as misogyny, systemic legal failures, or social inequality, thereby framing sexual violence as exceptional rather than being symptomatic of larger patterns. Although thematic framing, which links individual cases to broader social concerns, is still relatively uncommon, it is beginning to appear in certain progressive media outlets (Carlyle et al., 2008).

Sensationalism further complicates media narratives, as coverage tends to spotlight rare or extreme cases of violence while largely overlooking more prevalent forms such as intimate partner violence (Pennington & Birthisel, 2015; Soothill & Walby, 1991). This imbalance is

also attributed to commercial pressures: emotionally charged and sensational headlines tend to draw more public attention, making them more profitable for media organizations (Sacco, 1995).

Beneath these trends lies the continued influence of rape myths, which are culturally embedded stereotypes that downplay the severity of assault, and shift blame to the victim (Cuklanz, 2019; Franiuk et al., 2008). These myths commonly call into question the credibility of victims or imply their complicity (Franiuk et al., 2008). Their uncritical reproduction in media narratives can serve to normalize violence and hinder momentum for systemic change.

Despite extensive scholarship on problematic media framings, relatively little attention has been paid to narratives that support prevention or survivor empowerment. Media coverage rarely highlights prevention strategies or available resources for survivors. Instead, it frequently centers on individualized cautionary tales, which reinforce the notion that responsibility lies with potential victims and deflect attention from the structural reforms necessary to address sexual violence effectively (Egen et al., 2020; Sutherland et al., 2019).

With that in mind, the following research question looks in depth on the factors that shape the news stories on sexual violence against women:

RQ1: What themes and frames are most salient in newspaper coverage of sexual violence against women?

In line with the comparative approach of this thesis, the following provides an in-depth review of literature from the five country cases.

Print Media Coverage in Singapore

In Singapore, state regulation of media is extensive, with strict constraints on how politically or socially sensitive topics are reported (Rodan, 1998). This regulatory environment encourages narrative framing that prioritizes individual morality and personal responsibility, often sidelining critical engagement with structural or institutional factors (George, 2012). Coverage of sexual violence, for instance, is frequently positioned within discourses of moral or cultural decline, which can inadvertently shift blame onto victims and deflect attention from systemic shortcomings (Vitis, 2020). But also, stringent defamation laws and the threat of legal repercussions have cultivated a media culture that tends to avoid investigative scrutiny. Consequently, journalists may be hesitant to critique institutional power, resulting in limited public discourse around mechanisms of accountability (Sim, 2011).

Print Media Coverage in South Africa

South Africa continues to report some of the highest levels of sexual violence worldwide, and the media plays a crucial role in shaping public perceptions of this ongoing crisis (AHO, 2021). Yet, scholarship indicates that news reporting reinforces damaging stereotypes rather than critically examining the underlying structural drivers of sexual violence such as economic inequality, entrenched gender norms, and deficiencies within the legal system (Jewkes, 2002). A major obstacle to meaningful public dialogue is the persistence of rape myths in media narratives, which tend to question victim credibility or imply their complicity in the violence they experience (Gqola, 2007).

South African media tend to sensationalize sexual violence, reducing complex social issues to dramatic, isolated incidents (Gqola, 2015). This framing tends to elevate high-profile cases into temporary spectacles, while failing to maintain attention on the systemic and institutional failures that enable such violence. The episodic nature of this coverage hampers the

development of sustained, informed public engagement with the deeper causes of gender-based violence (Moffet, 2006).

Another pressing issue is the racialized framing of sexual violence in the media, where Black and immigrant men are frequently portrayed as the primary aggressors, while the experiences of survivors from varied racial and socioeconomic backgrounds are marginalized or ignored (Moffett, 2006). Such portrayals obscure critical historical and structural factors, including the legacies of apartheid, pervasive inequality, and gaps in institutional accountability that are essential to understanding the pervasive nature of gender-based violence in South Africa (Buiten, 2007).

Print Media Coverage in England

In the English media landscape, portrayals of sexual violence vary markedly between tabloid and broadsheet publications. Tabloids such as *The Sun* and *The Daily Mail* have been frequently criticized for sensationalist reporting, victim-blaming tendencies, and the reinforcement of gendered stereotypes (Mason & Monckton-Smith, 2008). In contrast, broadsheets like *The Guardian* and *The Independent* tend to adopt a more nuanced approach, giving greater attention to systemic issues and amplifying survivor perspectives, regularly presenting sexual violence as a reflection of broader societal problems (McRobbie, 2009; Meyers, 1997). The Leveson Inquiry (2011), initiated in the wake of the phone-hacking scandal, marked a turning point in discussions around British press ethics and accountability, prompting calls for tighter regulation and more responsible reporting (Ogbebor, 2020).

Nonetheless, inconsistencies in coverage persist. Tabloid outlets tend to continue framing sexual violence as a series of isolated events, emphasizing salacious details or celebrity involvement while neglecting underlying structural conditions (Sacco, 1995; Carter & Weaver, 2003). A similar pattern is observable in the U.S., where the #MeToo movement has

brought unprecedented visibility to sexual violence and centered survivor voices (Mendes, 2018). Yet much of the coverage remains focused on prominent individuals, which can obscure the institutional and systemic dynamics that enable such abuse (Boyle, 2019).

Racial bias in media reporting on sexual violence often intersects with broader patterns of Islamophobia and xenophobia. South Asian and Black men—particularly those from Muslim communities—are disproportionately depicted as perpetrators, especially in tabloid coverage (Van Dijk, 1991; CfMM, 2021). High-profile cases involving “grooming gangs” have further fueled racialized narratives that conflate ethnicity and religion with criminal behavior (Tufail, 2015). In contrast, white offenders are more likely to be portrayed in neutral or even sympathetic terms, with media frequently referencing personal struggles or mitigating circumstances (Franiuk et al., 2008). These imbalances reinforce harmful myths, obscure the fact that sexual violence spans all racial and social groups, and limit broader public understanding of the systemic nature of gender-based violence (Walby et al., 2017).

Print Media Coverage in the USA

The coverage of sexual violence in U.S. media has undergone notable transformation in recent years, particularly in the wake of the #MeToo movement. This cultural shift brought unprecedented visibility to survivor narratives and drew public attention to enduring institutional shortcomings in addressing sexual misconduct (Mendes et al., 2018). Yet, despite this heightened awareness, media reporting remains largely focused on prominent individuals, sidelining deeper analysis of the systemic factors that enable abuse. High-profile cases like those involving Harvey Weinstein and Jeffrey Epstein, were frequently framed through legal proceedings and personal failings, with comparatively little emphasis on the broader structures, such as corporate silence or legislative gaps, that allowed such behavior to persist (Boyle, 2019).

Also, media portrayals of sexual violence remain deeply racialized. Black and Latino men accused of such crimes are more likely to have their race emphasized and are frequently framed through a criminalized lens (Cockbain & Tufail, 2020). In contrast, white perpetrators are typically framed with nuance, sometimes depicted as troubled individuals or victims of circumstance (Franiuk et al., 2008). These contrasting portrayals not only sustain damaging stereotypes, but also divert attention from systemic inequalities underlying gender-based violence. Consequently, media narratives shift focus from institutional accountability to individual pathology, limiting opportunities for meaningful public discourse (Iyengar, 1991).

Print Media Coverage in Australia

Media representations of sexual violence in Australia are shaped by the intersecting influences of gender, race, and the country's colonial history - all of which continue to impact how such cases are portrayed and understood by the public (Our Watch/ANROWS, 2021). Research highlights that when Indigenous women are involved, news coverage regularly relies on sensationalist framing, emphasizing graphic or emotionally provocative content that perpetuates the "stranger danger" myth (Cripps, 2021). This narrative stands in contrast to empirical data, which consistently show that most acts of sexual violence are committed by someone known to the victim (ABS, 2023). Such representations tend to obscure the complex interpersonal and systemic dynamics underlying sexual violence, especially those forms that occur within familial or community settings (Sutherland et al., 2016).

A content analysis by Dunne Breen et al. (2017) identified four dominant patterns in Australian media coverage of rape: sensationalism, victim-blaming, the silencing of survivor perspectives, and a lack of broader context. These tendencies not only distort public understanding but also contribute to the persistence of stigmatizing narratives (Carlyle et al., 2008). Some critique how Indigenous women are frequently portrayed either as voiceless

victims or as representatives of a culture allegedly predisposed to violence - an interpretation that wrongly pathologizes marginalized communities while ignoring the structural forces that shape such realities (Cripps, 2021).

Comparative Themes Across Countries

Despite varied media systems, several consistent patterns emerge, highlighting the press's significant role in shaping public discourse around gender-based violence.

One widely observed trend is the media's tendency to emphasize high-profile cases, especially those involving public figures or celebrities. While this coverage can raise visibility, it generally reduces complex issues to spectacle, overshadowing the structural conditions that enable sexual violence (Boyle, 2019; Gqola, 2015). The dominance of episodic framing, limits opportunities for linking these cases to broader systemic concerns such as gender inequality or institutional failure (Iyengar, 1991; Carlyle et al., 2008).

Sensationalism is another recurring issue, particularly pronounced in tabloid journalism in the United States and England, where emotionally charged language and graphic details are used to attract readership. In Australia and South Africa, this approach also skews public perception, framing sexual violence as rare and exceptional rather than pervasive (Cripps, 2021; Moffett, 2006).

Victim-blaming and marginalization persist across all five contexts, though the forms vary. Coverage frequently includes references to victims' clothing, alcohol use, or behavior, particularly in tabloid reporting (Mason & Monckton-Smith, 2008). In South Africa and Australia, survivors from racialized or Indigenous communities are typically depicted as either passive or culturally complicit, obscuring the role of historical and structural inequality (Taylor & Serisier, 2010; Cripps, 2021).

While some national outlets have made progress, for example, UK broadsheets increasingly frame cases within broader institutional contexts following the Leveson Inquiry (Campbell & Cowan, 2015). Investigative coverage remains limited in several settings, and deeper structural critiques are usually sidelined.

The findings highlight that despite growing awareness, media coverage of sexual violence remains shaped by spectacle, stereotypes, and institutional avoidance. A shift toward thematic framing, intersectional sensitivity, and accountability-focused reporting is essential if journalism is to contribute meaningfully to gender justice.

Framing Sexual Violence: Linguistic Categories in Media Discourse

Prior research has consistently shown that the terminology used to describe both victims and perpetrators is rarely neutral; instead, it subtly influences perceptions of credibility, blame and moral standing (Franiuk et al., 2008; Cuklanz, 2000; Gill & Orgad, 2018). This study contributes to that body of work by organizing linguistic frames into a categorization that reflects the broader ideological positions embedded within national media systems. These categories, ranging from euphemistic terms to system-level critique, offer a practical and conceptual tool for tracing how journalistic discourse constructs meaning around sexual violence.

Naming and Responsibility

One of the most immediate ways media shape perception is through naming. “Victim terminology” governs how credibility, vulnerability and moral status are conferred. As Franiuk et al. (2008) demonstrate in their study of the Kobe Bryant case, phrases like “alleged victim” or “accuser” subtly introduce doubt, framing the survivor as potentially untrustworthy. Similarly, referring to individuals as “rape victims” versus simply as “women”

alters the emotional and evaluative tone of the narrative (Meyers, 1997). These lexical choices become even more consequential when paired with “victim-blame language”, subtle references to clothing, alcohol, or behavior that reinforce rape myths and redirect responsibility away from the perpetrator (Henley et al., 1995; Bohner et al., 1998).

Language describing the accused also matters. “Perpetrator terminology” reflects degrees of culpability or neutrality, ranging from “rapist” or “offender” to the more ambiguous “suspect” or “man.” Gill and Orgad (2018) point out that the use of neutral or sanitized labels works to dilute public perception of harm. Closely related is “perpetrator identity language,” which constructs familiar, even sympathetic narratives about alleged perpetrators, e.g., portraying them as “family men” or “promising athletes” (Pennington & Birthisel, 2015). Such frames can soften moral judgment and reallocate narrative sympathy in troubling ways.

Framing and Emotional Impact

Beyond naming conventions, media also rely on affective and discursive strategies that shape emotional response and moral evaluation. “Victim emotion language” involves terms that highlight or interrogate survivors’ psychological states, words like “distraught,” “hysterical,” or “resilient.” Such language reflects gendered and racialized assumptions, subtly affecting perceived credibility.

“Euphemistic terminology” further complicates reporting. Easteal et al. (2015) show how phrases like “incident,” “encounter,” or “inappropriate behavior” frequently replace legal or violent terms such as “rape” or “assault,” reducing the perceived severity of the act.

Relatedly, “mitigating language” includes lexical strategies that cast doubt using qualifiers like “alleged,” “controversial,” or “unverified” that can undermine survivor accounts (Cuklanz, 2000).

“Sensationalist language,” on the other hand, tends to amplify emotional response through shock-value terms “horrific,” “brutal,” or “shocking.” Cripps (2021) critiques this tendency in the Australian media, especially in coverage of Indigenous women, arguing that it can distract from structural realities and reduce complex experiences to narrative spectacle.

Structural Positioning and Ideology

While lexical choices shape local meaning, broader ideological effects emerge through how stories are framed. “Violence terminology” concerns the explicitness and precision with which acts are described in legal terms like “rape” versus vague descriptors like “abuse”. Many outlets avoid legal language, contributing to public misunderstanding about the nature and prevalence of sexual violence (Burt, 1980; Lonsway & Fitzgerald, 1994).

The distinction between “episodic framing” and “thematic framing” (Iyengar, 1991) is also central. Most media continue to treat sexual violence as a series of isolated events, focusing on individual actors and court cases rather than connecting these incidents to systemic gender inequality or institutional failure (Carlyle et al., 2008).

“Legal terminology” adds another layer. While references to court cases and statutes can bolster credibility, this reliance can also defer moral judgment, encouraging audiences to await institutional outcomes rather than engage in broader critique (Greer & McLaughlin, 2011).

There is growing evidence of a shift toward more empathetic and structural reporting. “Empathy/support language” includes narratives that foreground survivor agency or resilience, what is referred to as “post-#MeToo” reorientation (Mendes, 2018). Similarly, “cultural descriptors” offer insights into how societal norms and gender roles influence

interpretation, especially in national contexts with strong moral or religious overtones (Lazar, 2005).

Finally, “social system critique” captures overt attempts to locate sexual violence within broader structures such as patriarchy, neoliberalism, or racial capitalism. For journalism to contribute meaningfully to gender justice, it must go beyond naming individuals to confronting the systems that perpetuate violence (Serisier, 2018). This category, while less frequent, is essential to identifying where media move from passive narration to active engagement with the conditions that make violence possible.

Media guidelines, ethical standards and regulatory bodies

Media reporting on sexual violence is influenced not only by editorial choices but also by a complex array of constraints, including legal statutes, regulatory structures, and professional ethical codes (Council of Europe, 2018; UNESCO, 2020). These frameworks shape how narratives are constructed and determine which stories reach public attention. Although many nations rely on self-regulatory mechanisms and journalistic codes of conduct, adherence varies widely. In practice, media outlets prioritize sensational or high-profile stories, driven by commercial incentives and audience appeal, even when such approaches conflict with established ethical norms (Parliamentary Assembly, 2010). While professional guidelines may call for connecting incidents to broader societal patterns, coverage tends to be episodic, focusing on individual events in isolation rather than addressing the systemic nature of sexual violence (Cuklanz, 2000). Additionally, legal constraints, particularly defamation and privacy laws, can create a chilling effect on investigative journalism. Although these laws play a legitimate role in protecting personal rights, they may also inhibit in-depth reporting on institutional shortcomings in the handling of sexual violence cases (Medina, 2023; Cambridge Media Law, 2024).

Cross-national media research highlights that differences in press coverage are shaped by the structural and philosophical foundations of national media systems (Hallin & Mancini, 2004; McQuail, 2010). This analysis considers the variation between models such as the liberal, commercially driven press system found in the United States and more state-regulated environments like Singapore. These divergent systems influence not only the autonomy of journalists, but also the ethical and legal parameters that govern reporting on sensitive issues such as sexual violence.

Moreover, media narratives are shaped not solely by institutional policies but also by entrenched journalistic conventions including personalization, dramatization, and episodic framing, which affect how stories are told and understood (Iyengar, 1991; Patterson, 2000). Ethical norms, therefore, should not be seen as merely formal guidelines, but as embedded within broader cultural and normative traditions, whether rooted in libertarian ideals of press freedom or more communitarian approaches emphasizing social responsibility (Christians et al., 2009). These underlying orientations offer a valuable framework for analyzing how print journalism negotiates the tensions between public interest, ethical reporting, and the risks of sensationalism.

Rather than aiming to draw a direct causal link between regulation, ethics, and reporting outcomes, this study seeks to examine how national policy contexts and institutional settings shape the broader media environment in which sexual violence is covered. By situating media practices within their structural and normative constraints, it becomes possible to better understand the conditions under which responsible and contextually informed reporting can or cannot occur.

Therefore, this thesis proposes a second research question:

RQ2: How do media guidelines and legal frameworks shape the reporting environment for sexual violence across different national contexts?

This section looks at the media landscape in Singapore, South Africa, England, the USA and Australia by exploring the media guidelines, legal frameworks and regulatory bodies that control print media, focusing on how they impact the reporting of sexual violence.

Singapore: Media Control and Ethical Constraints

Singapore exemplifies a statist-authoritarian media system characterized by top-down control, limited press autonomy and a regulatory philosophy that subordinates journalistic independence to state interests (George, 2012; Hallin & Mancini, 2012). The Singaporean government holds substantial control over the media landscape, primarily through the Infocomm Media Development Authority (IMDA), which has regulated media content and licensing since 2016 (Infocomm Media Development Authority [IMDA], 2023).

Complementing this, is the Newspaper and Printing Presses Act (NPPA), which mandates government-issued permits for print outlets, thereby enabling oversight over both media ownership and editorial content (Singapore Statutes Online, 1974/2023). While journalists have a legal mandate to report on public interest matters, the NPPA, alongside stringent defamation laws, has fostered a culture of self-censorship, particularly on sensitive issues such as sexual violence (George, 2012). Investigative journalism is further hindered by the legal risks associated with defamation, especially when reporting implicates state institutions or high-profile individuals (Freedom House, 2024). Although these laws aim to prevent reputational harm, they may unintentionally curtail critical scrutiny of how institutional systems enable or overlook sexual violence.

South Africa: Freedom of the Press Amid Ethical Challenges

South Africa reflects aspects of the democratic transition media model, which combines constitutional protections with residual structural inequalities and contested regulatory effectiveness (Wasserman, 2013). Although the South African Constitution guarantees freedom of the press, reporting on sexual violence remains fraught with ethical and legal challenges. The Press Council of South Africa provides editorial guidelines aimed at ensuring fairness, accuracy, and the protection of vulnerable individuals (Press Council of South Africa, 2021). However, adherence is inconsistent and instances of sensationalized reporting persist. The Protection of Personal Information Act (POPIA) further complicates reporting by limiting the disclosure of identifying information, especially in sensitive cases involving survivors of sexual violence (POPIA, 2013). While such protections are crucial for safeguarding victims' rights, they may also hinder journalistic investigations into institutional failures. As a result, South African media practitioners must navigate the tension between privacy obligations and the public's right to know, frequently under the threat of legal repercussions (Wasserman, 2013).

England: Ethical Reforms and Regulatory Oversight

England operates within a liberal-democratic media model characterized by commercial pluralism, press freedom and formal accountability mechanisms (Curran & Seaton, 2018). Media regulation is governed by a well-established framework designed to uphold journalistic ethics and protect individuals affected by sensitive reporting. The Independent Press Standards Organisation (IPSO) serves as the primary regulatory body, enforcing the Editors' Code of Practice, which emphasizes accuracy, fairness, and respect for victims of sexual violence (Editors' Code of Practice, Cl. 11; IPSO Sexual Offences Guidance, 2023). Legislative safeguards such as the Defamation Act 2013 introduced a "serious harm"

threshold, aiming to reduce frivolous lawsuits while reinforcing public interest protections for journalists (House of Commons Library, 2014). Privacy concerns are addressed through the Human Rights Act 1998, which incorporates Article 8 (right to privacy) and Article 10 (freedom of expression) from the European Convention on Human Rights (Barendt, 2006). Additionally, the Data Protection Act 2018, aligned with the EU's General Data Protection Regulation (GDPR), shapes how personal data may be used in journalism, although it includes specific exemptions for media practices (Voinea, 2025). The Leveson Inquiry (2012), launched in response to ethical violations in the press, also spurred reforms that aimed to reestablish trust in journalistic standards (Morrison, 2017). Despite these regulatory mechanisms, the implementation of ethical practices remains inconsistent across different media outlets, particularly between broadsheets and tabloids (Bastos, 2016).

United States: First Amendment Protections and Ethical Challenges

The United States is a paradigmatic example of the liberal commercial press model, marked by market-driven content, minimal regulatory oversight and strong constitutional protections (Hallin & Mancini, 2004). The freedom of the press is constitutionally protected under the First Amendment, which prohibits legislative interference with journalistic expression (Cornell Legal Information Institute, n.d.-a). Unlike many other countries, the U.S. lacks a central regulatory authority for print media. Instead, newspapers typically follow voluntary ethical frameworks like the Society of Professional Journalists' (SPJ) Code of Ethics, which emphasizes accuracy, harm reduction, editorial independence and accountability (SPJ, n.d.-a). Still, these guidelines are not enforceable and the commercial orientation of U.S. media frequently incentivizes sensational reporting, particularly in coverage of sexual violence, where graphic content may be favored over contextual or investigative depth (Lee & Chen, 2020). At the same time, legal protections for the press have been strengthened by landmark

rulings such as *New York Times Co. v. Sullivan* (1964), which established the “actual malice” standard, making it difficult for public figures to win defamation suits and thereby reinforcing journalistic freedom to scrutinize those in power (Cornell Legal Information Institute, n.d.-b).

Australia: Self-Regulation and Defamation Concerns

Australia reflects elements of the liberal model with a strong tradition of self-regulation, but rising legal pressures and uneven enforcement reveal systemic tensions (Richards & Rupa, 2021). Print media operates under a self-regulatory model, with the Australian Press Council (APC) serving as the principal authority. The APC enforces ethical standards through its Statements of Principles, emphasizing accuracy, fairness, and respect for privacy (Australian Press Council [APC], n.d.). Its Advisory Guidelines further highlight the need for sensitive reporting on issues such as family and domestic violence (APC, n.d.-a). The Defamation Act 2005, implemented at the federal level, seeks to balance reputational protection with freedom of expression (Dent & Kenyon, 2004). However, concerns have been raised that its broad scope may deter investigative journalism, particularly when reporting on institutional responses to sexual violence (Osborne-Crowley, 2023). Although the Australian Communications and Media Authority (ACMA) regulates broadcasting and online content, print journalism falls squarely under the jurisdiction of the APC.

Methodology

Research Design

This study employs a mixed methods framework, integrating quantitative content analysis with qualitative contextual examination, to analyze how media outlets represent sexual violence against women. The approach allows for both the identification of linguistic patterns

across large textual datasets (RQ1) and the interpretation of contextual factors influencing media framing across national settings (RQ2).

Data Collection

Data for this study was gathered through a combination of API-based retrieval and web scraping techniques. The API-based retrieval approach was used for The Guardian US and UK using The Guardian Open Platform API. For news sources lacking an accessible API, web scraping was conducted using the “rvest” and “httr” packages in R (Wickham, 2021, 2022). The scraping process involved automated crawling of article URLs, identifying and extracting relevant fields such as publication dates, headlines, and full article text.

Non-textual content, advertisements and navigational elements were removed to focus the dataset solely on textual content. The extracted articles in all 5 datasets were included if they contained one of the following keywords: *sexual violence*, *rape*, *sex crime* or *sexual offense*.

Sample

The dataset comprises 928 news articles published between November 30, 2022 and November 30, 2024. This two-year time frame was selected to avoid distortion caused by isolated scandals or thematic news spikes, thereby supporting a more balanced representation of coverage trends. The sample includes print media from five countries: *The Strait Times* (Singapore), *The Citizen* (South Africa), *The Guardian UK* (England) and *The Guardian US* (USA) and *The Australian* (Australia). Outlets were selected based on readership data from the Reuters Digital News Report (2023), ensuring that each source holds national relevance and substantial public visibility. Scraping accessibility was also a key factor for sample choice, as some outlets actively block or restrict web scraping. It is also important to note that the implications of this sampling approach are discussed further in the limitations section.

Keyword Dictionary

To examine how media coverage frames sexual violence, a keyword dictionary is assembled in this study to help identify narrative patterns that reinforce stereotypes, place blame on victims, or obscure systemic contributors to sexual violence.

The keyword categories derive from an existing theoretical framework that examines how sexual violence against women is represented in the media (see Appendix, Table A2). This framework builds on prior research that outlines recurring themes, framing strategies and language choices commonly found in news reporting on the subject (Benedict, 1992; Buiten, 2007; Cuklanz, 1996; Egen et al., 2020; Entman, 1993; Fairbairn & Dawson, 2013; Franiuk et al., 2008; Gill & Orgad, 2018; Los & Chamard, 1997; Mendes et al., 2018; Meyers, 1997; Seabrook et al., 2019; Sutherland et al., 2016; Ward, 2016).

Further, Latent Dirichlet Allocation (LDA) was used to expand the primary dictionary (see Appendix A). The topic modeling process began with identification of frequently co-occurring word patterns, including bigrams and trigrams. These patterns were grouped into distinct topics, each consisting of semantically related terms. The results were then manually filtered depending on their contextual specificity to retain only those topics relevant to sexual violence narratives. These filtered topics were labeled and evaluated for inclusion in the keyword dictionary (see Appendix, Table A3). Lastly, the data-driven LDA output was cross-referenced with theory-based terms to validate their relevance and expand the dictionary while maintaining analytical consistency.

Analytical Techniques

Keyword Frequency (RQ1)

Each article was pre-processed by removing stop words and tokenizing the text. A frequency analysis was then used to examine how often dictionary terms appeared, both within individual datasets and across countries. To enable cross-national comparisons, frequencies were normalized according to the number of articles in each dataset. This approach helped reveal dominant themes and differences in how sexual violence is framed in various media environments.

Sentiment analysis (RQ1)

To assess tonal framing, sentiment analysis was used with the Bing lexicon. This lexicon was selected due to its binary polarity system, which aligns with prior media studies aiming to detect generalized tonal patterns in journalistic texts and effectiveness in news-related sentiment detection (Boukes, 2019; Jockers, 2017; Liu, 2012).

Each article in the dataset was assigned an overall sentiment score, calculated by analyzing the frequency and polarity of emotionally charged language. This approach enabled a comparative analysis of tonal patterns across different regions, offering insight into how the reporting of sexual violence varies in tone between national media systems.

Qualitative Contextual Analysis (RQ2)

To better understand differences in media framing, this study includes a cross-national examination of journalistic guidelines, regulatory frameworks, and legal standards. This helps situate the findings within broader institutional and structural contexts, showing how national systems influence how sexual violence is reported.

Ethical consideration

This study analyzed only publicly available news articles and did not involve any personal or identifiable data, aligning with ethical guidelines for secondary data analysis. Since no human participants were involved, formal institutional ethics approval was not required. Still, given the sensitive nature of sexual violence reporting, ethical concerns were carefully considered throughout the research process. In particular, efforts were made to avoid reinforcing stigmatizing or victim-blaming narratives when selecting keywords and interpreting the data, in keeping with ethical standards for research on sensitive topics.

Validation check

To assess the relevance and coherence of the keyword dictionary, LDA was used to identify thematic groupings across the corpus and compared them with the dictionary terms. Then, a stratified random sample of 10% of the articles balanced across the five national sub-corpora was manually reviewed to evaluate whether keyword matches accurately reflected the intended framing categories, such as victim-blaming or euphemistic language.

Since terms in the dictionary can have multiple meanings depending on context (e.g., “*incident*,” “*case*,” “*accuser*”), they were included in a category only when their usage in both LDA outputs and sampled articles consistently aligned with the conceptual definitions established in the framework. Because the coding was conducted by one person, steps were taken to ensure consistency and minimize bias. That is done through developing the dictionary stemming from an explicit theoretical framework, refining categories during the manual validation stage and cross-checking ambiguous cases against both the literature and topic modeling outputs, as mentioned previously through a stratified random sample check. This approach follows practices for ensuring trustworthiness in single-coder textual analysis (Braun & Clarke, 2006; Schreier, 2012) and helped ensure that the dictionary captured

meaningful patterns in how sexual violence is represented in media coverage, rather than relying only on surface-level word matches.

Findings

Sample

A descriptive analysis shows that the number of articles collected varied significantly across countries. The United States contributed the largest part of the dataset ($N = 253$), followed by Singapore ($N = 240$) and England ($N = 229$), then South Africa ($N = 142$) and lastly Australia ($N = 64$) with the least number of articles. These differences partly reflect varying levels of media output across the selected sources.

Research Question 1: Salient Topics in Media Coverage and Geographic Variations

Keyword analysis

The keyword analysis examined 15 thematic categories, including victim-blaming language, perpetrator identity, euphemistic terminology and legal or systemic framing (see Table 1). These categories were developed based on recurring patterns identified in prior media research on sexual violence (see Appendix, Table A1). To account for variation in sample sizes across countries, keyword frequencies were normalized per 1,000 words, allowing for consistent cross-national comparison. This normalization follows established practice in computational text analysis, where term frequency is scaled relative to document length to ensure comparability across texts of different sizes (Grimmer & Stewart, 2013).

Table 1.

Keyword Frequencies of Thematic Language Categories in News Coverage of Sexual Violence

Variable	Singapore (n)	South Africa (n)	England (n)	USA (n)	Australia (n)
victim_terms	70.00000	55.63380	68.12227	65.21739	79.68750
victim_blame	21.66666 7	7.042254	16.59388 6	30.039526	15.625000
victim_emotion	32.91667	35.21127	41.04803	39.92095	45.31250
perpetrator_terms	78.33333	66.90141	65.06550	64.82213	57.81250
mitigating_language	57.91667	45.07042	58.07860	66.79842	46.87500
perpetrator_identity	30.83333	33.09859	29.25764	31.22530	31.25000
violence_terms	97.91667	98.59155	77.72926	77.86561	98.43750
euphemistic_terms	86.25000	85.91549	87.77293	86.16601	87.50000
episodic_framing	0.000000 0	0.704225 4	0.436681 2	0.0000000	0.0000000
thematic_framing	0.833333 3	4.225352 1	1.746724 9	1.9762846	7.8125000
legal_terms	90.83333	78.16901	89.51965	89.72332	68.75000
sensationalism	30.00000	32.39437	31.00437	39.13043	42.18750
empathy_support	70.41667	65.49296	75.10917	68.77470	79.68750
cultural_descriptors	0.000000 0	0.704225 4	0.000000 0	0.3952569	0.0000000
social_system_critique	2.916667	10.56338 0	10.04366 8	6.719368	15.625000

Note: Values represent normalized keyword frequencies per 1,000 words across five national datasets.

Victim-related framing appeared most frequently in Australian (79.69 per 1,000 words) and Singaporean (70 per 1,000 words) coverage, while the lowest frequency was observed in the South African dataset (55.63 per 1,000 words) (see Table 1). *Victim-blaming language* was most prevalent in articles from the United States (30.03 per 1,000 words) and Singapore (21.67 per 1,000 words) and least common in South Africa (7.04 per 1,000 words), suggesting a comparatively lower use of blame-oriented narratives in that context. *Emotional framing of victims* was highest in Australian coverage (45.31 per 1,000 words), followed by England (41.05 per 1,000 words), while South Africa again showed the lowest rate (35.21 per 1,000 words), though the differences across countries were relatively modest.

Perpetrator-related terminology was relatively consistent in all five countries, with Singapore leading (78.33 per 1,000 words), with the rest of the countries showing similar levels (ranging from 57.81 to 66.9 per 1,000 words). A similar, but slightly higher level of consistency is observed in terminology related to *perpetrator identity*, with only minimal variation across countries (ranging from 29.26 to 33.1 per 1,000 words) with South Africa showing the highest, while England reports the lowest frequency. *Mitigating language* appeared most regularly in the United States (66.80 per 1,000 words) and England (58.08 per 1,000 words) and was less frequent in Australia (46.88 per 1,000 words) and South Africa (45.07 per 1,000 words).

Keywords related to *violence* appear in nearly all articles from Australia (98.43 per 1,000 words), South Africa (98.59 per 1,000 words) and Singapore (97.91 per 1,000 words). In comparison, the United States and England show slightly lower frequencies, with 77–78 per 1,000 words of articles containing such terms. This suggests a broadly consistent use of explicit language when describing sexual violence across national contexts. It is still notable that *euphemistic language* also appears frequently in all five countries (85–88 per 1,000

words), indicating that many reports rely on softer or less direct terminology when referring to these incidents.

Episodic framing is rare across the dataset, with the highest occurrences in England (0.43 per 1,000 words) and South Africa (0.70 per 1,000 words) and virtually none in the remaining countries. Thematic framing is also relatively limited but is most prevalent in Australia (7.81 per 1,000 words) and South Africa (4.22 per 1,000 words), suggesting a stronger emphasis on structural or societal causes in these national contexts.

Legal terminology appeared most frequently in coverage from Singapore (90.83 per 1,000 words), United States (89.72 per 1,000 words) and England (89.52 per 1,000 words), proposing that news reporting in these countries generally adopts a legal or criminal justice framing of sexual violence. On the other hand, *sensationalistic* or dramatic language was less prominent overall. The highest rates of sensationalism were observed in Australian (42.18 per 1,000 words) and U.S. newspapers (39.13 per 1,000 words), with England showing the lowest frequency (30 per 1,000 words).

Empathy-oriented language was most common in Australian (79.68 per 1,000 words) and British (75.11 per 1,000 words) coverage, pointing to a generally supportive narrative tone in those contexts.

References to *cultural structures* such as gender norms or patriarchy were largely absent across all countries, appearing only minimally in South Africa (0.70 per 1,000 words) and the United States (0.39 per 1,000 words). Some *critique of broader social systems*, including terms like “public health issue” or “systemic sexism,” was more frequent in Australian media (15.62 per 1,000 words), though overall such framing remained relatively uncommon, particularly in Singapore (2.92 per 1,000 words).

Statistical differences across countries

To evaluate whether the frequency of media framing categories varied across countries, non-parametric Kruskal–Wallis H tests were conducted. This approach was employed to address violations of normality and homogeneity of variances, thereby enabling distribution-free comparisons, given non-normal and heteroscedastic data across national contexts. Results indicated statistically significant differences in several thematic categories: *victim-related terms*, $H(4) = 35.41, p < .001, \epsilon^2 = .034$; *victim-blaming language*, $H(4) = 26.68, p < .001, \epsilon^2 = .025$; *perpetrator-related terms*, $H(4) = 46.78, p < .001, \epsilon^2 = .046$; *mitigating language*, $H(4) = 19.79, p < .001, \epsilon^2 = .017$; *empathy-supportive language*, $H(4) = 25.01, p < .001, \epsilon^2 = .023$; *violence-related keywords*, $H(4) = 116.62, p < .001, \epsilon^2 = .122$; *legal terminology*, $H(4) = 67.05, p < .001, \epsilon^2 = .068$; and *euphemistic language*, $H(4) = 37.48, p < .001, \epsilon^2 = .036$. These effect sizes ranged from small to moderate in most categories and were upper-moderate for *violence-related terms*, suggesting meaningful variation in how sexual violence is framed across national media contexts.

No statistically significant difference was observed in the use of *sensationalistic language* ($H(4) = 6.12, p = .191, \epsilon^2 = .002$). Also, categories such as *episodic framing* and *cultural descriptors* were excluded from inferential analysis due to minimal variance, which limited the potential for reliable statistical interpretation.

Post hoc pairwise comparisons using Mann–Whitney U tests with Bonferroni correction (see Appendix, Table A4) revealed that Australian media had higher median frequency ranks than South African levels in *victim-related language* ($p = .024$) and *empathy-supportive wording* ($p = .018$). U.S. outlets also consistently used more *victim-blaming* and *mitigating* terms than all other countries (*all* $p < .05$). In the use of *legal terminology*, England and Singapore significantly surpassed Australia ($p = .007$ and $.023$, respectively) and England also used

more *euphemistic terms* than the U.S. ($p = .032$). This confirms the descriptive patterns noted earlier.

Sentiment Analysis

Sentiment analysis was used to explore the evaluative tone of media coverage, indicating whether reporting tended to be supportive, critical, or neutral regarding sexual violence against women. A Kruskal–Wallis H test revealed a statistically significant difference in sentiment scores across countries, $H(4) = 593.32, p < .001$, with a large effect size ($\epsilon^2 = .74$).

To further investigate these differences, Dunn’s post hoc test with Bonferroni correction was conducted. Singapore’s sentiment had significantly higher median rank sentiment scores than those of the United States ($Z = 5.79, p < .001$), suggesting a particularly more supportive tone in its reporting. The United States also showed significantly more negative sentiment compared to the United Kingdom ($Z = 3.41, p = .006$) and Australia ($Z = 2.98, p = .028$). No significant differences were found between South Africa and any other country (all $p > .05$), indicating that sentiment in South African media coverage was statistically similar to the rest.

Figure 1.

Distribution of sentiment scores across countries



A visual analysis of sentiment score distributions (see Figure 1) corroborates the statistical findings. Singapore exhibited the highest median sentiment score, indicating a more positive evaluative tone, while the United States had the lowest, consistent with a more negative framing. Interquartile ranges (IQRs) varied by country, with greater internal variability observed in the United States and South Africa than in Singapore or Australia. These distribution patterns reinforce the significant cross-national differences identified by the Kruskal-Willis H test.

Research Question 2: Media regulation and the reporting environment

Table 2.

Cross-country comparison of media guidelines and law regulations

Country	Media Control & Ethical Guidelines	Regulatory Bodies & Laws	Key Challenges
Singapore	Tightly controlled by the government through IMDA; focuses on social responsibility and public morality.	IMDA, Newspaper and Printing Presses Act (NPPA), stringent defamation laws.	Self-censorship due to defamation laws; limits on investigative reporting, especially regarding institutional failures.
South Africa	Freedom of the press guaranteed by the Constitution; Press Council issues ethical guidelines for sensitive reporting.	Press Council of South Africa, Protection of Personal Information Act (POPIA).	Sensationalism, racial bias, privacy laws limiting transparency on systemic violence.
England	Regulated under IPSO; Editors' Code of Practice emphasizes accuracy, fairness, and respect for victims.	IPSO, Defamation Act 2013, Data Protection Act 2018, Human Rights Act 1998.	Sensationalism in tabloids; commercial pressures; varying adherence to ethical guidelines.
United States	Highly open media environment; SPJ Code of Ethics encourages voluntary ethical adherence.	No central regulatory body; First Amendment, SPJ Code of Ethics, New York Times Co. v. Sullivan (1964).	Sensationalism driven by commercial interests; lack of regulatory oversight leads to ethical inconsistencies.
Australia	Self-regulated by the APC; Statements of Principles emphasize accuracy, fairness, and respect for privacy.	APC, Defamation Act 2005; ACMA oversees broadcasting but not print media.	Commercial pressures leading to sensationalism; defamation laws discouraging investigative journalism.

Note: Summary of key regulatory and ethical environments for selected five countries

This section analyzes how legal frameworks and ethical guidelines shape the reporting of sexual violence across five national contexts. While media systems differ in structure and

regulatory philosophy, common tensions between editorial independence, ethical responsibility, and commercial pressures emerge across all cases.

Singapore represents the most tightly controlled environment. State regulation, enforced by the Infocomm Media Development Authority (IMDA) and laws like the Newspaper and Printing Presses Act (NPPA), places significant restrictions on media freedom. Although these controls aim to promote public morality and social cohesion, they often discourage investigative journalism, especially when it concerns state institutions or systemic failures.

In contrast, the United States maintains one of the least regulated media environments. With no centralized oversight for print journalism, ethical standards are largely voluntary, guided by professional bodies such as the Society of Professional Journalists (SPJ). While First Amendment protections offer strong legal support for press freedom, this decentralized model often leads to inconsistencies in how sensitive issues like sexual violence are reported.

Commercial incentives further contribute to sensationalist coverage.

Australia and the United Kingdom both operate under self-regulatory models, but with more formalized structures. In Australia, the Australian Press Council (APC) provides detailed ethical guidelines, particularly around reporting on domestic and family violence. The United Kingdom's Independent Press Standards Organisation (IPSO) enforces the Editors' Code of Practice, which includes clauses designed to protect victims of sexual violence. Notably, regulatory reform following the Leveson Inquiry has led to tighter editorial standards.

However, implementation remains uneven across different types of outlets.

Sensationalism also occurs as an issue for England and Australia, countries which still strive towards balanced media freedoms but struggle with sensationalism and commercial pressures, which the U.S. is also subjected to. Despite those advantages, the South African media still struggles with issues of sensationalism and racial bias, as privacy laws, like the Protection of

Personal Information Act (POPIA), can limit transparency in government-related violence cases (Press Council of South Africa, 2021).

South Africa presents a hybrid model. While press freedom is constitutionally protected and the Press Council promotes ethical journalism, enforcement mechanisms remain weak.

Sensational reporting, racialized framings, and legal restrictions, particularly related to privacy, continue to constrain reporting on institutional and systemic forms of sexual violence.

As summarized in Table 2, all five countries face some degree of tension between formal ethical commitments and the realities of media practice. Tabloids and commercially driven outlets, in particular, often fall short in adhering to professional guidelines. Legal constraints such as defamation and privacy laws can further limit critical reporting, especially in jurisdictions like Singapore and Australia. Ultimately, while ethical codes and regulatory structures are in place, their impact is shaped by how they interact with broader institutional norms and market dynamics.

Discussion

In response to Research Question 1, the analysis revealed meaningful variation in keyword framing across the five national contexts. Victim-blaming language was especially prevalent in U.S. coverage, consistent with prior scholarship that highlights the American media's tendency to individualize blame and perpetuate gender myths (Henley et al., 1995). This pattern may reflect both the lack of regulatory oversight and the influence of commercial pressures, which encourage sensational and conflict-driven narratives over systemic analysis (Carlyle et al., 2008).

Australian and English media exhibited the highest rates of victim-related and empathy-driven language. In Australia, this was paired with a notable frequency of thematic framing and social system critique, suggesting a somewhat more structural understanding of

sexual violence. This aligns with findings by Cripps (2021) and Dunne Breen et al. (2017), who observe both ethical sensitivity and occasional sensationalism in Australian reporting. The Singaporean press, while showing high empathy with victim-related framing, there was also a frequent use of mitigating language and a strong reliance on legal terminology, highlighting the tendency to frame sexual violence within criminal justice discourse. A similar empathy frequency is exhibited with Singapore, which also had high positive sentiment scores, but demonstrated minimal use of thematic framing or cultural descriptors. This disjunction likely stems from strict regulatory environments that prioritize social cohesion and avoid politicized discourse (George, 2012; Rodan, 1998).

Perpetrator-related terminology appeared most frequently in Singapore and South Africa, while mitigating language was especially common in the U.S. These trends suggest that even where perpetrator visibility is high, framing may still subtly diffuse accountability through neutral or sympathetic descriptions. The sentiment analysis corroborated these patterns: U.S. coverage exhibited the most negative sentiment, while Singapore's tone appeared most supportive.

Sentiment scores must be interpreted cautiously. As Rodan (1998) and Easteal et al. (2015) argue, positive tone can sometimes mask deeper structural silences. In Singapore, for instance, support for victims may coexist with the erasure of institutional complicity, framing violence as an isolated moral anomaly rather than a systemic issue. Thus, sentiment alone is insufficient to assess progressive or ethical reporting.

The most striking omission across all countries was the near absence of cultural or systemic framing. Despite the recognition among scholars that media play a crucial role in linking gender-based violence to structural inequality (Cuklanz, 2000; Serisier, 2018; Vega Montiel, 2014), such framings were virtually absent. Even in countries with more developed ethical

codes like England and Australia, the default remained episodic and legalistic. This confirms longstanding critiques that news narratives prioritize individual events over social explanations (Carlyle et al., 2008).

Findings related to Research Question 2 highlight how media regulation and ethical governance shape national reporting environments. Singapore represents a model of high regulatory intensity, where state control over media content via the Infocomm Media Development Authority (IMDA) and the NPPA curtails investigative and thematic reporting. Here, the use of euphemistic yet empathetic language reflects a carefully managed discourse that emphasizes social responsibility while avoiding institutional critique (Rodan, 1998).

At the opposite end, the United States typifies a low-regulation media environment. While constitutionally protected press freedom allows for editorial diversity, the absence of binding ethical standards results in significant variability in reporting practices. Commercial imperatives dominate, encouraging sensational coverage and inconsistent attention to ethical norms (Boyle, 2019; SPJ, n.d.-a).

South Africa, though constitutionally committed to press freedom, reflects a hybrid model. While guidelines exist to promote respectful reporting (Press Council of South Africa, 2021), these are inconsistently applied and sensational or racialized narratives usually persist (Gqola, 2015).

The UK and Australia represent self-regulated systems with formal ethical codes but weak enforcement mechanisms. In both countries, defamation laws and market pressures simultaneously constrain and distort journalistic practice. Although reforms following the Leveson Inquiry improved standards in the UK (House of Commons Library, 2014), tabloids continue to favor episodic, victim-focused storytelling.

In comparative terms, media systems fall along three regulatory models: (1) tightly controlled and conservative (Singapore); (2) loosely regulated and commercially driven (U.S., partially South Africa); and (3) self-regulated with variable compliance (UK, Australia). Each model presents unique barriers to ethical, systemic coverage of sexual violence.

Unexpected Patterns and Implications

An unexpected finding was the simultaneous use of euphemistic and graphic violence-related language within the same national contexts, particularly in Singapore and Australia. While existing literature treats these as mutually exclusive (Easteal et al., 2015), their co-occurrence may reflect editorial balancing acts, seeking to meet ethical standards while still attracting readership. This also suggests internal inconsistencies within outlets or editorial preferences.

Another surprising result was the minimal presence of cultural descriptors or social critique, despite widespread acknowledgment in feminist and media studies of the importance of framing sexual violence as structurally rooted (Yang et al., 2025). This gap highlights the persistent reluctance of mainstream media to engage with feminist paradigms or to hold institutions accountable. It also supports Serisier's (2018) observation that media discourse frequently reproduces individualistic, decontextualized narratives.

While the positive coverage in Singaporean media might seem empathetic, it could also be a way of avoiding a deeper look at the system behind the issue. This kind of framing could downplay the broader social responsibility, turning violence into a personal tragedy instead of something the public needs to address. So, just because the tone is supportive, doesn't necessarily mean the journalism is progressive.

Limitations

Even though this study offers important cross-national insights, there are still several limitations to address. First, the dataset includes only five English-language newspapers, which limits the applicability of the findings to non-English-speaking contexts. The study's reliance on a single newspaper per country also limits its representativeness, so including more diverse media sources would strengthen future comparative analyses. Second, differences in archival availability and access may have affected the sample sizes, particularly in countries with restricted press systems or paywalled content. Although the mixed-methods approach enabled broad pattern detection, it did not fully capture temporal shifts or internal media diversity. Future studies could use longitudinal designs to trace changes over time or apply supervised machine learning to enhance the detection of emerging media narratives with greater nuance.

Implications and Recommendations

This study shows that journalism needs to improve the ethical standards of reporting on important and delicate topics like sexual violence. In countries like England and Australia, where the press is regulated, better editorial regulation could help reduce victim-blaming and episodic reporting. However, in more tightly controlled countries like Singapore, reforms to support editorial independence and investigative journalism are of importance to improve the coverage of the addressed topic (Sim, 2011). Lastly, advocacy groups and media could work in collaborations to improve the reporting on the topic, through educating the media workers. An additional benefit to this would also be to educate the public on a variety of components, like institutional failures, that factor in these events, not just individual behavior.

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Appendix

Appendix A. Topic Modeling via LDA

To uncover the main themes present in media coverage, this study uses a seeded sequential Latent Dirichlet Allocation (LDA) model on the processed text data. LDA is a “probabilistic generative method that treats each document as a combination of multiple topics, with each topic represented by a unique distribution of words” (Blei et al., 2003). This approach is particularly useful for identifying dominant narratives within the media. Unlike standard unsupervised LDA, a constrained variant is applied here, where the model is guided by a predefined set of topic categories and keyword dictionaries. This ensures that the resulting topics remain consistent and comparable across different datasets.

Table A1.

Keyword dictionary

Victim terminology	Victim blame language	Victim emotion language	Perpetrator terminology	Mitigating language	Perpetrator identity language	Violence terminology	Euphemistic terminology	Episodic framing	Thematic framing	Legal terminology	Sensationalism	Empathy support language	Cultural descriptors	Social system critique
victim	provoked	traumatized	accused	alleged	family man	rape	incident	isolated incident	societal problem	alleged crime	scandal	courage	societal norms	patriarchy
survivor	invited	vulnerable	suspect	supposed incident	young man	sexual violence	affair	one-time event	systemic issue	court proceedings	shocking	resilience	gender roles	systemic
alleged victim	consensual	violated	perpetrator	misunderstanding	husband	molestation	scandal	singular occurrence	public health issue	due process	horrifying	justice	cultural expectations	public health issue
reporting party	in the wrong place	suffered	attacker	allegedly	boyfriend	intimate partner violence	sexual incident	standalone case	systemic	court order	tragic	victim survivor	cultural standards	crime statistics
victims	risky behavior	bruises	alleged perpetrator	allegations made	partner	gender-based violence	sexual report	uncommon event	cultural expectations	legal case	brutality	violence counseling	established customs	deep-rooted
survivors	allegedly committed	choked	rapist	allegedly committed	stepfather	harassment	misconduct	rare situation	social issue	law	torture	brave	traditional values	embedded
complainant	incited	trauma	attackers	false accusations	immigrant	statutory rape	alleged assault	unique case	public concern	court	gruesome	bravery	social expectations	ingrained
complainants	instigated	posttraumatic	offender	unfounded lies	father	sexual assault	degrading treatment	unusual incident	community challenge	trial	rape mutilation	resilient	cultural paradigms	fundamental
injured party	evoked	horrified	aggressor	reputation	spouse	domestic violence	distorting conflict	anomaly	cultural dilemma	jury	unprecedented	resilience	institutional norms	system-wide
affected person	prompted	targeted	assailant	leniency	partner	family violence	event	atypical event	collective problem	prosecutors	controversy	determined	collective values	rooted in the system

target	mutual	distressed	assailants	counterclaim	household provider	mass rape	occurrence	rare episode	structural issue	enforcement	disgrace	determination	community standards	widespread issue
oppressed	agreed-upon	devastated	accuser	overturning	upstanding citizen	gendered violence	situation	uncharacteristic event	systemic challenge	civil	outrage	perseverance	traditional frameworks	patriarchal sexism
wronged individual	willing	suffering	accomplices	misconduct	well-regarded figure		episode	lone occurrence	societal concern	testimony	notorious	persevered	public attitudes	sexism
subject		scarred	convicted	supposed	significant other		case	exceptional situation	institutional problem	damages	startling	endured	traditional roles	
reported victim		exposed	defendant	claimed		rape case	affair	isolated case	public crisis	indictment	unbelievable	abuse survivor	cultural gender roles	
accuser		defenseless	offender	presumed		rape trial	matter	rare incident	widespread issue	sentencing	unexpected	overcomer	gender constructs	
rape victim		susceptible	prime suspect	alleged event		sexual abuse	reported event	lone episode	pressing concern	conviction	appalling	justice seeker	gender expectations	
rape victims		weak	assaulter	rumored incident		coercive control	alleged occurrence		national problem	appeal	disturbing	assault survivor	conventional gender roles	
		helpless	culprit	supposedly		physical violence	development		social crisis	acquittal	terrifying	crime survivor	social norms	
		endangered	sexual offender	reportedly		femicide				prosecution	groundbreaking	victim	cultural norms	
		exploited	sexual predator	according to reports		sexual exploitation				criminal charges	frightening	survivor trauma	of traditional values	
			convicted assailant	as stated		sexual slavery				criminal proceeding	traumatizing		cultural constructs	
			sex criminal	as claimed		sexual torture				court appearance	harrowing		commonly held beliefs	
			sexual assaulter	alleged to have		trafficking				court process	alarming		society's expectations	
			convicted rapist	baseless allegations		torture				courtroom				
				unfounded claims		sexual trafficking				legal proceeding				

wrongful accusations	forced intercourse	criminal court
fabricated charges	violation	district court
groundless allegations	abuse	judicial
dubious claims	sexual violation	defense counsel
questionable accusations		rights groups
disputed charges		state prosecutor
contested allegations		
false claims		
misleading		
deceptive accusations		
fraudulent charges		

Table A2.

Conceptual definitions of keyword categories

Category	Definition
Victim terminology	Terms used to refer to the subject of sexual violence. Variations reflect differing degrees of formality, credibility, neutrality, or ideologically loaded framing.
Victim-blame language	Lexical items that imply or directly suggest the victim's responsibility for the assault, either through behavior, consent, or situational framing.
Victim emotion language	Words that describe the emotional or psychological state of the victim, often used to frame their credibility, vulnerability, or moral status.
Perpetrator terminology	Labels for the accused or convicted individual(s), ranging from legal identifiers to informal or stigmatized references.
Perpetrator identity language	Language that constructs the identity of the perpetrator in familiar or humanizing ways (e.g., "family man," "upstanding citizen"), which may mitigate perceived culpability.
Mitigating language	Terms that downplay the seriousness of the crime, suggest doubt, or frame the allegations as unsubstantiated or politically motivated.
Violence terminology	Terms that explicitly name the forms of violence involved, from legal classifications (e.g., "rape") to broader descriptors (e.g., "coercive control").
Euphemistic terminology	Language that softens or obscures the severity of sexual violence, often replacing legal or violent terms with neutral expressions (e.g., "incident," "affair").
Episodic framing	Phrasing that presents the event as a singular, isolated occurrence, disconnected from wider social or systemic issues.
Thematic framing	Terms that frame sexual violence as part of broader societal problems or cultural patterns, thereby situating the issue in a structural context.
Legal terminology	References to legal procedures, court settings, or judicial processes used to lend institutional authority or frame events through the lens of legality.
Sensationalist language	Words or phrases intended to provoke shock, horror, or heightened emotional response; often linked to tabloid-style reporting.
Empathy/support language	Language that signals solidarity with victims, emphasizes resilience, or promotes recognition of survivors as agents rather than passive recipients of harm.
Cultural descriptors	Phrases reflecting the role of societal norms, gender roles, or traditional expectations in shaping perceptions of sexual violence.
Social system critique	Terms that explicitly challenge or critique structural and ideological systems (e.g., patriarchy, sexism) believed to underpin sexual violence.

Table A3.

LDA Keyword Count By Country

Country	Australia	South Africa	England	United States	Singapore
victim_terms	199	194	352	482	600
victim_blame	3	9	29	33	62
victim_emotion	10	25	66	56	44
perpetrator_terms	68	443	193	242	363
mitigating_language	29	102	213	220	184
perpetrator_identity	1	15	6	66	3
violence_terms	425	388	615	534	1088
euphemistic_terms	13	103	155	180	113
episodic_framing	0	0	0	0	0
thematic_framing	2	0	0	0	0
legal_terms	3	15	7	27	8
sensationalism	12	22	51	74	16
empathy_support	92	89	157	172	69
cultural_descriptors	0	1	0	0	0
social_system_critique	6	11	3	5	2

Note. Analysis includes only LDA derived keywords

Table A4.

Mann–Whitney U Post Hoc Test

Category	Comparison	U-statistic	Bonferroni p-value	Significant ($\alpha = .05$)
victim_terms	USA vs. Australia	5778.5	$p = .002$	TRUE
victim_terms	USA vs. England	26155.0	$p = .562$	FALSE
victim_terms	USA vs. Singapore	23088.0	$p < .001$	TRUE
victim_terms	USA vs. South Africa	18129.0	$p = 1.000$	FALSE
victim_terms	Australia vs. England	8818.5	$p = .112$	FALSE
victim_terms	Australia vs. Singapore	7963.5	$p = 1.000$	FALSE
victim_terms	Australia vs. South Africa	5849.5	$p = .006$	TRUE
victim_terms	England vs. Singapore	23178.5	$p = .028$	TRUE
victim_terms	England vs. South Africa	17900.5	$p = .898$	FALSE
victim_terms	Singapore vs. South Africa	21083.5	$p < .001$	TRUE
victim_blame	USA vs. Australia	9266.0	$p = .166$	FALSE
victim_blame	USA vs. England	32181.5	$p = .029$	TRUE
victim_blame	USA vs. Singapore	31280.0	$p = 1.000$	FALSE
victim_blame	USA vs. South Africa	21384.0	$p < .001$	TRUE
victim_blame	Australia vs. England	7150.0	$p = 1.000$	FALSE
victim_blame	Australia vs. Singapore	6937.0	$p = .809$	FALSE
victim_blame	Australia vs. South Africa	4780.0	$p = 1.000$	FALSE
victim_blame	England vs. Singapore	25493.0	$p = .398$	FALSE
victim_blame	England vs. South Africa	17414.0	$p = .366$	FALSE
victim_blame	Singapore vs. South Africa	19407.5	$p = .003$	TRUE

Category	Comparison	U-statistic	Bonferroni p-value	Significant ($\alpha = .05$)
perpetrator_terms	USA vs. Australia	9219.0	$p = .742$	FALSE
perpetrator_terms	USA vs. England	28027.5	$p = 1.000$	FALSE
perpetrator_terms	USA vs. Singapore	21260.0	$p < .001$	TRUE
perpetrator_terms	USA vs. South Africa	17500.0	$p = 1.000$	FALSE
perpetrator_terms	Australia vs. England	6201.5	$p = .482$	FALSE
perpetrator_terms	Australia vs. Singapore	4663.5	$p < .001$	TRUE
perpetrator_terms	Australia vs. South Africa	3929.5	$p = .952$	FALSE
perpetrator_terms	England vs. Singapore	20524.5	$p < .001$	TRUE
perpetrator_terms	England vs. South Africa	16040.0	$p = 1.000$	FALSE
perpetrator_terms	Singapore vs. South Africa	20463.0	$p = .008$	TRUE
mitigating_language	USA vs. Australia	10268.0	$p = .006$	TRUE
mitigating_language	USA vs. England	29052.5	$p = 1.000$	FALSE
mitigating_language	USA vs. Singapore	29937.0	$p = 1.000$	FALSE
mitigating_language	USA vs. South Africa	21163.5	$p = .023$	TRUE
mitigating_language	Australia vs. England	5637.5	$p = .031$	TRUE
mitigating_language	Australia vs. Singapore	5906.0	$p = .028$	TRUE
mitigating_language	Australia vs. South Africa	4278.5	$p = 1.000$	FALSE
mitigating_language	England vs. Singapore	27314.0	$p = 1.000$	FALSE
mitigating_language	England vs. South Africa	18803.0	$p = .074$	FALSE
mitigating_language	Singapore vs. South Africa	19844.0	$p = .044$	TRUE
empathy_support	USA vs. Australia	6495.0	$p = .107$	FALSE
empathy_support	USA vs. England	25010.0	$p = .072$	FALSE
empathy_support	USA vs. Singapore	23649.5	$p < .001$	TRUE
empathy_support	USA vs. South Africa	16733.5	$p = 1.000$	FALSE
empathy_support	Australia vs. England	8065.5	$p = 1.000$	FALSE

Category	Comparison	U-statistic	Bonferroni p-value	Significant ($\alpha = .05$)
empathy_support	Australia vs. Singapore	7432.5	$p = 1.000$	FALSE
empathy_support	Australia vs. South Africa	5169.5	$p = .987$	FALSE
empathy_support	England vs. Singapore	23776.5	$p = .091$	FALSE
empathy_support	England vs. South Africa	17080.0	$p = 1.000$	FALSE
empathy_support	Singapore vs. South Africa	19886.5	$p = .044$	TRUE
violence_terms	USA vs. Australia	3129.5	$p < .001$	TRUE
violence_terms	USA vs. England	28726.0	$p = 1.000$	FALSE
violence_terms	USA vs. Singapore	19566.0	$p < .001$	TRUE
violence_terms	USA vs. South Africa	16363.0	$p = 1.000$	FALSE
violence_terms	Australia vs. England	11762.0	$p < .001$	TRUE
violence_terms	Australia vs. Singapore	10673.5	$p < .001$	TRUE
violence_terms	Australia vs. South Africa	7212.5	$p < .001$	TRUE
violence_terms	England vs. Singapore	17388.5	$p < .001$	TRUE
violence_terms	England vs. South Africa	15265.0	$p = 1.000$	FALSE
violence_terms	Singapore vs. South Africa	22747.0	$p < .001$	TRUE
legal_terms	USA vs. Australia	10899.0	$p < .001$	TRUE
legal_terms	USA vs. England	27928.0	$p = 1.000$	FALSE
legal_terms	USA vs. Singapore	22656.0	$p < .001$	TRUE
legal_terms	USA vs. South Africa	19850.5	$p = .812$	FALSE
legal_terms	Australia vs. England	4614.5	$p < .001$	TRUE
legal_terms	Australia vs. Singapore	3697.0	$p < .001$	TRUE
legal_terms	Australia vs. South Africa	3417.0	$p = .036$	TRUE
legal_terms	England vs. Singapore	21197.0	$p < .001$	TRUE
legal_terms	England vs. South Africa	18552.5	$p = .216$	FALSE
legal_terms	Singapore vs. South Africa	22944.0	$p < .001$	TRUE

Category	Comparison	U-statistic	Bonferroni p-value	Significant ($\alpha = .05$)
euphemistic_terms	USA vs. Australia	11163.5	$p < .001$	TRUE
euphemistic_terms	USA vs. England	30910.5	$p = 1.000$	FALSE
euphemistic_terms	USA vs. Singapore	26845.0	$p = .254$	FALSE
euphemistic_terms	USA vs. South Africa	17174.5	$p = 1.000$	FALSE
euphemistic_terms	Australia vs. England	5202.5	$p = .003$	TRUE
euphemistic_terms	Australia vs. Singapore	4143.5	$p < .001$	TRUE
euphemistic_terms	Australia vs. South Africa	2731.0	$p < .001$	TRUE
euphemistic_terms	England vs. Singapore	22935.5	$p = .018$	TRUE
euphemistic_terms	England vs. South Africa	14628.0	$p = 1.000$	FALSE
euphemistic_terms	Singapore vs. South Africa	18275.0	$p = 1.000$	FALSE

Note. Pairwise comparisons were conducted using Mann–Whitney U tests across countries for each thematic keyword category. p-values were adjusted using the Bonferroni correction to account for multiple testing. Comparisons with Bonferroni-adjusted $p < .05$ are considered statistically significant.