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# Protection of children from the evil of pornography

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**Abstract**---A Child being considered as the wealth as well as asset of the nation primarily lies below the age of eighteen years. The evil of Pornography of children in India has been rising since decades. The challenges related to sexual abuse as well as exploitation of the children in the nation is getting bigger with the days and years passing by. The impact of pandemic on the pornographic industry has lead to a total rise of 95% in the child pornographic content available through various online portals and websites. The Government plays a role of guard by further taking national as well as international measures in order to tackle this evil of pornography of children.

**Keywords**---Child, Child Abuse, Child Sexual Abuse, Child Pornography, Exploitation.

## Introduction

*“The true character of a society is revealed in how it treats its children”*

-By Nelson Mandela

Children are the assets of the nation ancillary to future resource of manpower of the nation. Our children are citizens of tomorrow also known as the precious treasure of the future. Even the Constitution of India in its Preamble talks about “WE THE PEOPLE OF INDIA”, which means and includes all of us i.e. the citizens of India including children, which accords rights to its children as the citizen of the country. Children are considered as the most vulnerable section of the society which is a reason the crime against children is on its surge. The Supreme Court of India in case of (Sheela Barse & Others v. Union of India, 1986) observed child to be a national asset. History played a role of spectator as how this virtuous & helpless being has been subject to ample of exploitative acts.

Child Abuse has been the most common form of exploitation faced by this vulnerable section of the society. Abuse of Children basically refers to emotional, physical, or sexual mistreatment or neglect by an adult or guardian who is under a role of responsibility towards the one's under eighteen years of age. This particular form of Abuse takes place at every stratum of the community irrespective of religion, culture, racism, ethnicity and income. There exist different arrangements of Abuse of Child such as- Physical Abuse of Child, Mental Abuse of Child and Sexual Abuse of Child & Neglect. Abuse of Children is said to be a menace to the society but Sexual Abuse of Child is considered as the most substandard and muddling form of abuse towards the children of the society. In India there are various laws dealing with Sexual Abuse of Child but there is no statutory definition of the term Sexual Abuse of Child (including pornography of child) till the adjunct of Act no.25 of 2019. Sexual Abuse of Child can be largely classified into two brackets: Penetrative Sexual Offence (as rape, penetrative sexual assault, Prostitution, etc.) and Non- Penetrative Sexual Offence including sexual harassment, cyber sexual crimes (as child pornography), etc.

As the evil of pornography of children acts as an inter-jurisdictional issue, the first commitment made by the by the world leaders where India was a signatory, towards securing the interest of each & every child of the world for their welfare and protection, *United Nation Convention on the Rights of Child (UNCRC)* as on 20<sup>th</sup> day of November, 1989 also known as the Magna Carta in the field of child rights. As per Art. 19(1) of the Convention, the States are held free to undertake all suitable measures in order to secure the child from all the different categories of abuse, barbarity, maltreatment, neglect, exploitation including child sexual abuse which is an essential article for abolishing the increasing trend of child abuse and protecting them from all kind of mischiefs. Also, as under the **Optional Protocol to the Convention on the Rights of Child on the Sale of Children, Child Prostitution & Child Pornography, 2000** (Kumar, International Law For Welfare & Prevention of Crime, 2016) where India became a signatory in 2004, the protocol convention is deeply connected with the evolving trend of pornography of child held over the internet and digital media & hence dealt with the issue with

special reference to International Conference on Child Pornography on the Internet (Vienna, 1999).

### **Emergence of Child Pornography**

Few topics are quiet as controversial as child prostitution and child pornography. As Internet has proved to be the greatest technological inventions of the 20<sup>th</sup> century, but, unfortunately such advancements in computerised information and technology allowing the most vulnerable section of the society to reach out new sources of cognition and cultural experiences also results in leaving them vulnerable to exploitation and harm by computer-sex offenders. **Child Pornography is a crime practiced throughout the world irrespective of geographical limits which emerged as the fastest developing business over the internet contributing nearly \$3 billion annual revenue.** (Khatun, Legal Framework on Child Pornography: A Perspective, 2020) No nation of the world is left impervious from the grave crime of child pornography, & hence will require conscious sweat & blood from the government authorities, law implementing authorities and members of the society to curb the evil to guarantee that the children of the world are safe and free from the unfortunate crime of pornography of child. India has attempted this approach in order to criminalize such crime by providing ample provisions contained in different laws of the nation.

**The term “Pornography” for the first time was interpreted by the Oxford English Dictionary in the year 1857, which remarked about French writings of earlier times to be referred to writings with respect to prostitution, obscenity and obscene images (Hunt 1993)(Monique Mattei Ferraro, 2005). Pornography has been extracted from the Greek term ‘porno’ which means prostitutes & ‘graphein’ which means to put down, initially meant as any work or effort of art or literature which outlines the life of prostitutes or expounding on whores.** (Jenkins, 2021) Pornography is considered as a protean term which is available over the internet in various different forms involving pornographic websites, pornographic magazines, child pornography simulating sexual activities over the internet through the use of computers resources in order to produce sexual arouse in the mind of the viewers. “It is believed that the pornographic industry is a total contributor of about \$97 billion to the global economy as per the findings of Kasia Wosick, assistant professor at New Mexico State University”. Pornography of child is a form of exploitation in mental & sexual capacity which is also a heinous cybercrime. Every dominion has their own, specific definition of pornography of children. Child Pornography basically refers to an image or material which is obscene in nature published & transmitted through the use of internet and computer in order to exploit the most vulnerable section of the society. **As per the definition given by Section 2(1)(da) of the Protection of Children from the Sexual Offences Act, 2012 (POCSO)** (Justice, Section 2(1) (da) instituted by Act No.25 of 2019, The Protection of Children from Sexual Offences (Amendment) Act, 2019, 2019), *Child Pornography means and includes visually portraying of any behaviour or conduct involving sexual character of children, such as images, videos, photographs which are generated through use of technological inventions though use of computer and other related inventions which cannot be distinguished from the real images of the child so fabricated or adopted or altered, appearing to portray as a child.* Such form of child

pornography has led to increase in various other child sexual abuse such as sex-tourism, sexual grooming, sexting, etc. Child Pornography and Sexual Grooming has been increased over past twenty years due to excessive misuse of computer and internet. Sexting and child pornography both acts on an equal footing as both involves use of technology, internet and mobile in order to send or receive sexually abusive content related to children and adults. The victims of child pornography not just suffer from child sexual abuse, but also suffer from cyber defamation, helplessness, fear, humiliation, which can alter the life of the child permanently. It leaves a grave impact on the people of the society. As per the International Police Agency, INTERPOL, *Paedophiles* (adults involved in crimes of sexual abuse against children), has been provided the easy accessibility to children by involvement of different means and modes of technology and internet.

### **Impact of Pandemic on the exhibition of Child Pornography**

Crossing a total of 527.2 crore confirmed cases of covid with more than 62.8 lakh deaths across the globe (As per the readings of WHO), leaving a dark repercussion over the society as it resulted in changing the pattern of sexual exploitation leading a sharp rise in online activities by millions of cybercriminals (including paedophiles, cyber pornography addicts, child rapists, child molesters, etc.) as per the findings of United Nations Human Rights Commission.

Also, a recent report of 'Children India Helpline', within 11 days of national lockdown proclaims the rise in sexual abuse of children during the period which nearly amounted around 92,000 calls in SOS in demand for providing protection and security from grave abuse and ferocity inflicted on the children of the nation. Metro cities like New Delhi, Bombay, Calcutta, Chennai receiving a sharp rise in corona virus cases also has been red flagged as hotspot of child pornography (as per the outcomes of December studies). As per the words of Nivedita Ahuja, spokesperson of ICPF, pornographic networks are playing hide & seek with Indian law and Judiciary by just changing their websites URL. In order to get rid of this critical situation of rise in child pornography, the Govt. has to take brawny steps to safeguard the children of the society from child sexual abuse and violence, and shall also provide 'child sensitive cash transfer schemes' to the most vulnerable child and their poor families. As an upshot, 'National Cyber Crime Reporting Portal' got established by the Ministry of Home Affairs' which allows reporting of Child Sexual Abuse Material to the concerned authorities.

### **Indian Legislature in combating the issue of Child Pornography**

Cases of Child Pornography have been increasing since decades throughout the world as in 2020 nearly 21.7 million cases were reported which amounts to a total of 28% increase. Law making is not the same as law enforcing as there exists various child pornography laws in different nations, but their enforcement is feeble. As the Indian Constitution dealt with the right of having dignified life it guaranteed personal liberty under Art.21, the right against exploitation of the children under Art. 24, the opportunity for development of children by the State under Art.39(f) and early childhood care and protection & provision for providing free and mandatory education to the child until s/he completes 6 years of age under Art.45. Neither Indian Penal Code (IPC), 1860 ever contained any provision

which directly dealt with pornography of children but it only prohibited the display, sale, distribution, exhibition, circulation, etc. of obscene material or objects available to young persons under Sec. 292 & 293.

As the issue of child pornography is substantive as well as convoluted problem at local, national, & international levels, the steps taken in order to tackle this very issue by the Legislature of India acted as the first concrete governing legislation significantly safeguarding the rights of vulnerable children of our society; as there existed many different laws in India which helped in securing and developing the progeny of the nation, but there barely existed any law dealing with the atrocious crime of child pornography. The Information Technology (I.T.) Act of 2000 (i.e. Act no.21 of 2000), after its amendment in the year 2008 through Act no. 10 of 2009 also known as Information Technology (Amendment) Act, 2009 with the insertion of Section 67B which penalises the publication, browsing, downloading, etc. of the material in electronic form of any children involved in any sexually indecent or overt act with the punishment provided under the provisions of the Act.

For the sake of dealing with the rising instances of sexual abuse of child, the Legislature of India brought a special law, which is gender neutral as well extracted its power from Art. 15 of Indian Constitution & the Convention on the Rights of Child in year 1992, namely **The Protection of Children from Sexual Offences Act, 2012** (Justice, Act no 32 of 2012, 2012) (POCSO), a comprehensive section of Legislation, dealing with the object of protecting & securing the vulnerable section of the society from sexual abuse (including sexual assault & harassment, pornography of child) through establishment of special court houses for the speedy trial of offences & matters linked there with. Chapter III of the Act namely, *Using Child for Pornographic Purposes and Punishment Thereunder*, purposely deals with the offences similar thereto. As per Sec. 13 of the Act dealing with the usage of child for pornographic purposes by any person either for personal use or for distribution invited through use of any medium shall be held guilty for the offence under the section of the Act.

**The POCSO (Amendment) Act, 2019 which substituted section 14** (Justice, Subs. By Act no 25 of 2019, sec.7 for sec. 14, (w.e.f. 16-08-19), 2019) of the Act and punishes any person committing any offence under section 13, with imprisonment not less than five years & fine, and upon subsequent conviction imprisonment not less than seven years & fine. This section further provides punishment to the person using children for pornographic purposes, committing offence specified under Sec. 3, 5, 7, or 9 by getting itself involved in pornographic acts and also for offences specified under Sec. 4, 6, 8 & 10 respectively in supplement to the punishment which is provided under this section of the Act. Section 15 of the Amendment Act of 2019 states the punishment for storage or possessing of pornographic material and further failure for its deletion or destruction of such material whether used for commercial purposes or not shall be punishable under the provisions of the Act.

As per Rule no. 6(5) of the Information Technology (Guidelines for Cyber Café) Rules, 2011, which further provides that the computing systems present in the cyber cafés should be furnished & well equipped with the economically available safety or filtering programmes which assists in

avoiding unreasonable access to the websites and software containing pornography of children or any obscene information.

As per Rule 11 of the Protection of Children from Sexual Offences Rules, 2020 (Ministry of Women & Child Development, Government of India, 2020), any pornographic material of a child must be reported under the jurisdiction of the Special Juvenile Police Unit or local police under the J. J. (Care & Protection of Children) Act, 2015. Also, Sec. 79 of the J.J. (Care & Protection of Children) Act, 2015 provides punishment for exploitation of a child with imprisonment of 5 years and with fine of Rs. 1 lakh.

### **Steps taken by the Indian Government by implementing different policies in combating the issue of Child Pornography**

As per the Reports of Ministry of Women and Child Development Government of India, headed by Smt. Smriti Zubin Irani who called for zero tolerance of child pornography, on the information headed by the National Commission for the Protection of Child Rights (NCPCR) that reports regarding cybercrime i.e. violations with special reference to child pornographic content, the government took multiple steps for protecting children from online sexual abuse which is held to be executed by Internet Service Providers (ISPs)-

- Govt. in order to initiate steps to block the online portals containing Child Sexual Abuse Material (CSAM) based on INTERPOL's "Worst-of-List" through CBI (Central Bureau of Investigation) which stands as nodal agency of the nation working for INTERPOL.
- Govt. also ordered the prime ISPs located in India for accepting & removing the CSAM available over online platforms firmly grounded on the basis of Internet Watch Foundation (IWF), UK list. (P.I.B. Govt. of India, 2019)
- Also, the Govt. proposed to amend the POCSO Act of 2012 which would insert the definition of the term child pornography and the punishment for storing or transmitting such materials. (P.I.B. Govt. of India, 2019)

**As per India Child Protection Fund (ICPF)** (Fund, 2020) which is a social impact fund, the research study of October 2019 mainly aimed on the demand for CSAM over the internet and browsing websites. 10-day trial was conducted by ICPF in about 100 cities in order to dissuade the increasing demand for pornographic material of children with the help of advanced tools used for tracking the evil. The recommendations made by ICPF for suppressing the demand of CSAM are:

- CSAM tracker to be created nationwide through artificial intelligence tools stationed for this research;
- To provide education to the children and their parents & family with respect to the methodology of online sexual child abusers, & also on how the crime must be reported;
- Appropriate orders for lowering down the rate of CSAM by compulsorily reporting by the individuals through ISPs & social networking websites;
- The lead took by India for establishing an International Convention conducted for international cooperation which is legally bound which eliminates the creation, opening & viewership of CSAM. (Fund, 2020)

As per the advisory issued under the Home Affairs Ministry, upon the prevention and combating of cybercrime such as cyber stalking, cyber bullying, cyber pornography, cyber harassment, email or social network accounts hacking, unwanted exposure to sexually explicit material, identity theft, etc. against the children deals with few important points:

- Special training programmes, seminars and workshops should be conducted in order to aware and train the public at large and the law implementing agencies working for the effective enforcement of I.T. Act, 2000;
- Parents, Teachers and Children should be encouraged to report any suspicious behaviour and provide information regarding any website presenting obscene and exploitative images, or videos and also puts effort to coach children for sexual abuse;
- Social networking sites and services must be put under thorough surveillance and *Parental control software* must be developed;
- Procuring help of NGOs for combating the issue of online pornography;

**The Ministry further stated that the measures mentioned above are only suggestive, when necessity arises the State and Union Territories may issue additional measures for combating the crime against children on internet.**(Kumar, Crime Against Children under Special & Local Laws, 2016)

### **Role of Judiciary in resolving the evil of Child Pornography**

Indian Judicial System is that pillar of democratic govt. which not only interprets the law but also plays a vital role in law-making procedure on the basis of its resolutions passed. Judiciary has also played principal role while interpreting the laws against child sexual abuse including child pornography.

Pornography involves Obscenity over the internet which is hazardous for the betterment of the society involving children, also it has always been a question of law which has been addressed by different countries judicial system at times. Indian Judicial System in 1965 held the measures of Obscenity in India through its landmark judgement, (Ranjit D Udeshi v. State of Maharashtra , 1965)the Apex Court of India adopting the Victoria-era Hicklin test laid down in the famous case of(R. (Regina) v. Hicklin, , 1868)where Lord Chief Justice Alexander Cockburn, assessed Obscenity as what affects the mind of the vulnerable. But, with the year passing the judiciary has narrowed the scope of Obscenity held in case of(Aveek Sarkar v. State of W.B., (India)., 2014), where it was held by the Apex Court that the Hicklin Test is obsolete, and hence the Miller Test was adopted which was laid down in(Miller v. California, , 1972)and laid down a new test called Standard Community test which states that Obscenity is that which affects the mind of the community.

As in famous case of(Avnish Bajaj v. State (N.C.T. of Delhi), , 2008)famously called the Baze.com case, where a petition under Sec. 482 was filed under Delhi High Court hence the court stated that where the ostensible case for offences under Sec. 292(2)(a) & (d) of IPC was made against the website named baze.com (now ebay. in) both with special reference to listing and video clip respectively, “*by not*

*holding the filters suitable which could detect the words while listing or the pornographic material i.e. the videos of the contents being proposed for its sale, the website can run a risk of imputing it, having comprehension that the object was in fact obscene”, & knowledge of listing can be allocated to the co. as per the infliction of the strict liability rule under Sec.292 and recognised that there would lie no criminal liability on the CEO of the company under Sec.292, 294 of the IPC but Avnish Bajaj was held liable for the charges under Sec.67 (Punishment provided for publication or transmission of obscene material via electronic form) & 85 of the IT Act, 2000 for bringing the clippings of sexual act of the girls of Delhi Public School to be circulated on websites such as Baze.com to be allegedly bought by Avnish Bajaj the CEO of the company. Though this case doesn't give a clear picture of child pornography laws and its implication in India, there also exist recent pronouncements of the Indian Judiciary dealing with ensuring the vulnerable from this form of sexual abuse. The Apex Court asked the Centre to frame rules for handling the increasing child pornography on PIL filed by an NGO (Non-Governmental Organisation) for interceding to stop the circulation of child pornographic materials and child sexual assault videos online. The Supreme Court in case of (In Re Prajwala Letter Dated 18-02-2015, Videos on Sexual Violence & Recommendations., 2015), comprising a Bench with Justice Madan B. Lokur & Justice Uday Umesh Lalit, ordered the Central Govt. to frame Standard Operating Procedure in order to handle the complaints related to sexual abuse of children including pornography of children, obscene contents online, rape of child etc. and also to provide a copy of the Procedure to the internet service providers such as Google, Whatsapp (now Facebook or Meta), Yahoo, Facebook & Microsoft. In another recent case, (Debashish Bhattacharjee v. State of Karnataka, 2020), where allegations under Section 67B of the IT Act, 2000 has been framed on Mr. Debashish Bhattacharjee for watching child pornography materials while working in the company named Volvo Construction Equipment (Sales & Marketing) premises through the laptop provided by the company attaching external devices to it, which were noticed by the company's software application named 'Net Clean Pro Active' which was installed in the laptop of the company as a security measure. The Court in the said case quashed the F.I.R. & Complaint filed against the petitioner and held that continuing the prosecution will be abuse of process of law as there is no prima facie allegations to prove the involvement of the petitioner so as to attract section 67B of the IT Act, 2000. In another case where the petitioner browsed, downloaded and transmitted the materials associated with child pornographic content by using Airtel Sim through his Facebook & email accounts for which case was filed against the petitioner for offences committed under section 15(1) of POCSO Act, 2012 & section 67B of IT Act, 2000 where the petitioner was ordered to be released on sureties and bonds as it stated that viewing pornographic content privately will not constitute an offence (P.G. Sam Infant Jones v. State rep. By the Inspector of Police, 2021).*

## **Conclusion**

Pornography of Child is progressively autocratic in the current world and hence given the title as the fastest growing and developing internet exercises. The lockdown during this period acted as an open platform for the vulnerable child to get exposed to every facet of this advanced digital technology as these innocent children have no idea about the sexual predators roaming around to hunt them



as the total no. of sites explored by India in the year are nearly about 587 exclusively dealing with the worries of pornography of child.

The crime of pornography of child is legally as well as morally wrong. The reason behind the rise in the crime of pornography of child is lack of consistent skeleton laws on privacy, regulation of affair & pornographic contents. The life of child is at stake as a rise in pornography industry has been witnessed. In most of cases of child abuse it is identified that the child knows their abuser but a minute different concept exists in the case of pornography of child as here the abuser is not known to the vulnerable section of the society as it gets restricted through the virtual mode of its availability.

### **Suggestions**

- As stated by the UNICEF, there stand no adequate laws and regulations which directly deal regarding the treatment of pornography and sexual abuse of child. The most important step which shall aid in resolving the evil of child pornography must be spreading international awareness and strengthening major efforts for combating and securing the interest of the vulnerable section of the society.
- The authority shall form agencies having jurisdiction in the matters concerned with the social evil of pornography of child which corrupts the mind of the society and owes a negative impact on the society members.
- There must be appropriate recording of the cases through involvement of various platforms of the sexual abuse of the child as there is still some sort of hesitation in the society while discussing the issue of child abuse among the parents and children.
- As per the further suggestions through different governmental agencies, a national cybercrime reporting portal must be formulated which would report and filter the cases related to pornography of child easily available through different online portals.
- Also, last but not the least, the most important of all is that special care and protection must be provided to the child suffering from the sexual abuse in whatever manner.

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