



## Cyber obscenity on cyberspace: A special study of Victimisation women and children in present Indian era

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### Abstract

Obscenity is a worldwide and complex issue as it includes other related issues, for example, fairness and profound quality which differ from society to society. Cyber Obscenity is a danger to Internet clients around the globe as there are no regional limits that different the commission of crime between nations. The paper introduced is an endeavour to assess the law overseeing cyber Obscenity in India and its effect on infants.

The main focus of this research paper is that obscenity and pornography develop peer pressure among puberty and this may lead them to execute the offence. The paper is an endeavour to assess the law administering obscenity in India and suggests reasonable revision. This paper worries with adjusting the privilege of the right to speak freely of discourse and articulation with the guidelines of ethics of contemporary society. This paper worries to restrict the obscenity tends to debase and ruin those whose psyches are available to such corrupt impact.

In this article, the conversations have been limited around the main problems of women obscenity and its legal boundaries and suggestions from a cultural viewpoint in India.

**Keywords:** obscenity, pornography, electronic media, information technology act, 2000, Indian court

### Introduction

The Internet has brought forth another industry for online publishing and consumption on pornographic materials. A great many individuals around the globe are visiting websites for product fulfillment. These internet sites speak to the biggest development area of the digital economy. But internet usage is timely, it is also misused and countless different kinds of crimes are committed through this internet like hacking, cyber stalking, cyber defamation, cyber fraud, cyber forgery, cyber terrorism, IPR violation etc. Cyber pornography is one of them.

Obscenity is a very sensitive issue throughout the world, yet there is no fixed definition of the word 'obscenity' under any law. What is naked art or sexually explicit for one person that may be obscene or obscene to another? Obscenity on the Internet is not a common crime. The Internet has provided a medium to facilitate crimes such as obscenity or obscenity. Cyber obscenity is the trade of sexually expressed content within cyberspace. In spite of the fact that the Indian Constitution ensures the principal right to the right to speak freely of discourse and articulation; it has been held that a law against obscenity is established. The Supreme Court has defined obscenity as "offensive to modesty or decency"; Lewd, dirty, repulsive". It is difficult to testify whether any obscene material is illegal or not? A particular pornographic content might be illegal in India however not in different nations.

### Meaning and Definition of Cyber Obscenity

The term cyberspace was first used by William Gibson in his novel *Neuromancer* 1982. The term cyber or cyberspace refers to a virtual environment within which networked computer activity occurs and vulgarity is any statement or act that strongly influences the prevailing ethics of the time.

Pornography is a legal term that applies to any offensive morality and often has a similarity with the term vulgar. Obscenity is derived from the Lat word *obscaena*. In *R v. Hicklin* <sup>[1]</sup>, the word obscene was unmistakably characterized that any issue which tends to debase or ruin those whose psyches are available to unethical impact. The Hicklin's test expresses that an overseeing body may restrict whatever "debases and undermines those whose brains are available to such indecent impacts and into whose hands a distribution of this sort may fall."

Cyber-obscenity is the exchanging of sexually expressive materials inside cyberspace. Cyber pornography or obscenity banter is exceptionally perplexing on the grounds that pornography isn't really illegal. The test is the United Kingdom and different wards are whether the material is obscene and debase its watchers, yet there is an impressive legal and good distinction with respect to the measures that empower law authorities to set up obscenity and depravation <sup>[2]</sup>.

As indicated by the Supreme Court of India, "the idea of obscenity would contrast from nation to nation contingent upon the norms of morals of contemporary society." And that obscenity tends to debase and ruin those whose psyches are available to such shameless impacts.

### Origin and History of the Cyber Obscenity

The portrayal of unequivocal acts is as old as the development itself. Notwithstanding, the front line thought of obscenity for example cyber obscenity came after the production of the Internet. The Internet was made during the 1980s by the National Science Foundation ("NSF") which financed the fiber-select connections that framed the

<sup>1</sup> Ibid.

<sup>2</sup> <https://www.scribd.com/document/365736859/Cyber-Obscenity>

foundation of the Internet. At first, the Internet was generally restricted to clients who had an occupation related electronic mail account on a PC run by their boss. In 1991, the NSF lifted limitations against business use. The Internet is available to anyone with a PC, modem and telephone line. Regardless of the way that obscenity was by then present in society as books, magazines or recordings. Yet, after the innovation of the internet, these are made open inside the virtual space for example cyberspace. In the wake of making open these obscene materials on the internet, these are exceptionally close to the clients. Thusly right now cybercrime viz. cyber obscenity is submitting by individuals of each class of society in each nation <sup>[3]</sup>. The legal status of the advanced pornography industry differs from nation to nation. Most nations grant some level of grown-up amusement. While a few nations boycott pornography. These nations are Saudi Arabia, Iran, Bahrain, Egypt, UAE, Kuwait, Malaysia, Indonesia Singapore, Kenya, Cuba and India.

### Cyber Obscenity as a Crime

The term 'obscenity', when utilized corresponding to an offence, isn't characterized in any resolutions in India yet certain enactments recommend that 'obscenity' in specific conditions comprises an offence. These Legislations are Indian Penal Code, 1860 and The Information Technology Act, 2000 Although neither the Indian Penal Code nor the Information Technology Act characterizes word 'obscenity' is, yet area 292 of the IPC and segment 67 of the IT Act clarify 'obscenity' it signifies "anything which is lecherous or claims to the salacious interest or if its impact is ten to debase and ruin people" <sup>[4]</sup>.

### Pornography and Obscenity

Pornography is a more exasperated type of obscenity. For the most part, Obscenity and pornography are utilized as equivalent to one another in the territory of the internet. Cyber obscenity or pornography is a troublesome issue particularly because of the distinctions in the worthy furthest reaches of ethical quality in various nations. Cyber pornography is unmistakable from other Cyber Crimes like hacking, following cyber fakes, embedding infection and robbery of IPRs. Dissimilar to the later Cyber Crimes which undermine the very believability of the internet, cyber pornography advances the utilization of the internet. Cyber obscenity or pornography is a danger to Netizens. This would incorporate pornography websites; obscene magazines delivered utilizing PCs (to distribute and print the material and the Internet (to download and communicate explicit pictures, photographs, works and so forth) <sup>[5]</sup>.

### Child Pornography

Child pornography is a type of child sexual abuse. Child pornography is characterized as a visual portrayal, including any photo, film, video, picture, or PC or registers created picture or picture, regardless of whether made or delivered by electronic, mechanical, or different methods, of sexually express direct where the creation of the visual portrayal

includes the utilization of a minor taking part in sexually unequivocal lead.

Section 67 B of Information Technology (Amendment) Act, 2008 arrangements with the Punishment for distributing or sending of material portraying children in the sexually unequivocal act, and so forth in electronic structure. It says that whoever distributes, sends or makes text or digital picture gathers, looks for, peruses, downloads, publicizes, advances, trades or disseminates material in any electronic structure which portrays children occupied with a sexually unequivocal act or lead will be rebuked on first conviction with the confinement of all things considered a depiction for a term which may loosen up to five years and with a fine which may reach out to ten lakh rupees and in the occasion o second or ensuing conviction with detainment of one or the other depiction for a term which may loosen up to seven years and furthermore with fine which may stretch out to ten lakh rupees.

### Child Pornography in India – Legal Position

Child Pornography is a type of child sexual abuse. Child pornography is characterized as any visual portrayal, including any photo, film, video, picture or PC or PC created picture or picture, regardless of whether made or delivered by electronic, mechanical or different methods for sexually express direct where the creation of the visual portrayal includes the utilization of minor participating in sexually unequivocal lead.

Today, Cyber Pornography is a very big Industry. It is because of the following reasons:

The easy, free, efficient, convenient and anonymous accessibility to pornographic material through the internet. The namelessness of the cyberporn business, worldwide availability, issue of purview, various laws and norms of profound quality in various nations, which have made a joke of the laws and their implementation.

Section 67B22 of Information Technology (Amendment) Act, 2008 arrangements with the Punishment for distributing or communicating of material portraying children in the sexually express act, and so on in electronic structure. It says that whoever distributes, sends or makes text or digit pictures gathers, looks for, peruses, downloads, publicizes, advances, trades or disperses material in any electronic structure which portrays children occupied with a sexually unequivocal act or direct will be rebuked on first conviction with the confinement of either a portrayal for a term which may contact five years and with a fine which may loosen up to ten lakh rupees and in case of second or ensuing conviction with the detainment of one or the other portrayal for a term which may reach out to seven years and furthermore with fine which may reach out to ten lakh rupees.

Hence, Child Pornography is absolutely banned in India. Even browsing and Viewing is held to be Punishable. Whereas, online pornography content other than child pornography is permitted to be viewed and browsed. There is no absolute ban imposed on the Online Porn Content apart from Child Pornography in India. Hence, Online Obscenity can be held to be a grey area, as the legal situation is not clear. It is neither legalized nor criminalized. It is half way left. How can some Porn Content Online are considered to be a form of religious, artistic and scientific writings or work? It is completely derogating women thereby projecting women as a sexually satisfying Objects

<sup>3</sup> Origin and History of Cyber Obscenity, available at <https://newindialaw.blogspot.com/2012/11/v-behaviorurldefaultvmlo.html>

<sup>4</sup> [http://epgp.inflibnet.ac.in/.../epgp.../1504245693E-Text-Cyber Obscenity Pornography.pdf](http://epgp.inflibnet.ac.in/.../epgp.../1504245693E-Text-Cyber%20Obscenity%20Pornography.pdf)

<sup>5</sup> <https://www.encyclopedia.com/law/legal-and-political-magazines/obscenity-and-pornography-behavioral-aspects>

and also violating the law of Indecent Representation of Woman. For that matter, how can a normal Porn be justified and cannot affect the so called concepts of morality and decency in the society. One has to consider that how can these porn contents act on the minds of minors who watch these sites. This Content clearly project woman as a sexual objects and this may degrade the honour of the woman thereby resulting in various kinds of assaults against woman. When there is nothing like Sex education in India, then some authors justify pornography to be completely banned. This grey area needs immediate attention. Most of the authors who are against to Online Pornography also contend that the women who are participating in such acts are all "real women" who are not into Porn Business. They are made to participate in sexual acts by using force. This is derogatory to the honour and dignity of woman and in no way less criminal in nature than that of child Pornography [6].

### Cyber Obscenity in India

The cyber-world is a virtual world or space. There is no regional cutoff which separates the crime between the countries. Since in this stage in doing comparative crime, in any event, two countries may incorporate simultaneously. Once in a while, it would be hard to decide the nations' law should be applied in a specific case. The Indian court grasped the methodology of Common Law.

As in *Ranjit Udeshi v. State of Maharashtra* case, the Supreme Court set up a changed variant of the Hicklin test as the test for obscenity in India. The Supreme Court has seen that the trial of obscenity set somewhere near Cockburn C.J. in *Miller v. California* ought not to be discarded.

In an ensuing case, the Supreme Court additionally expressed on the test for obscenity. On account of *Chandrakant Kalyandas Kakodkar v. the State of Maharashtra*, the court held: "What is obscenity has not been characterized either in section 292 of IPC or in some other rule. It just forbids or punishes the mailing, bestowing, sending out, distributing and selling of the obscene issues. It the obligation of the Court to think about the obscene issue by taking a general perspective on the whole work and to decide if the obscene entries is so liable to debase and ruin those whose psyches are available to impacts of this short."

In *Samresh Bose v. Amal Mitra*, the Supreme Court held that the possibility of obscenity would differ from nation to nation contingent upon the standards of ethics of contemporary society.

### Cyber Obscenity under Various Legislations in India

Obscenity is an offence under the Indian Penal Code. Section 292 of the IPC complete sets out the conditions in which 'obscenity' is an offence. As indicated by section 292(1) state that any movement i.e.(a) deal, enlist, dispersion, public show or flow, makes, produce or has the ownership of any obscene book, handout, paper, drawing, painting, portrayal or figure or some other obscene item at all or (b) import, send out or pass on any obscene article for any of the reasons referenced aforementioned, or knowing or having motivation to accept the such obscene item will be offered, let to enlist, disseminated or openly displayed or in any way out into dissemination, or (c) partaking in or

getting benefits from any business in the course o which any such obscene items are, for any of the reasons previously mentioned, made, produce bought, kept, imported, traded, passed on, freely displayed or in any way put into flow, or (d) publicizes or makes known using any and all means at all that any individual drew in or is prepared to participate in any demonstration or that any such obscene article can be acquired from or through any individual or (e) offer or endeavor to do any demonstration, are the offense under section 292 o IPC [7].

Obscenity is also an offence under the Information Technology Act 2000. Section 67 of the Information Technology Act sets some hard boundaries that obscenity is an offence when it is distributed or sent or caused to be distributed in any electronic structure.

The Indecent Representation of Women (Prohibition) Act 1986 denies revolting portrayal of women. Section 2(C) of the Indecent Representation of Women (Prohibition) Act characterizes the profane portrayal of women as "the portrayal in any way of the figure of a woman, h structure or body or any part thereof so as to have the impact of being foul, o defamatory to, or slandering, women, or is probably going to debase, ruin or harm the public ethical quality or ethics."

This Act denies any distribution, show, commercials, produce or cause to create a deal, let to recruit, appropriate or course containing disgusting portrayal of women and the distribution or sending by post any books, leaflets, slide, film, composing, drawing, painting photo, portrayal or figure in any structure containing revolting portrayal of women.

Article 19 (2) of the Indian Constitution gives that the state has the ability to force sensible restrictions on opportunity of articulation to keep up ethical quality and tolerability. To handle the issue of obscenity and pornography, we have four significant laws.

The Indian Penal Code under section 292 extensively talks about the conditions under which 'obscenity' might be an offence. In the case of *Ranjit D. Udeshi v. State of Maharashtra* [8] Honourable Apex Court deciphered "obscene" and stated that obscene might be characterized as "hostile to humility or respectability, vulgar, grimy and ghastly." The Court additionally saw that it establish the sensible restriction on the privilege of the opportunity of articulation ensured by Article 19, condition 2 of the Constitution of India considering a genuine worry for profound quality or decency. Further, Court in *Samaresh Bose v. Amal Mitra* [9] held that the standards of ethics of the society, the idea of "obscenity" may differ starting with one nation then onto the next nation. For this situation, the court also differentiated between the expression "vulgarity" and "obscenity" by expressing that revolting composing isn't generally obscene. Disgusting Representation of Woman (Prohibition) Act, 1986 disallow the revolting portrayal of a woman by works, painting or through distribution. It is an offence under this Act and culpable [10].

<sup>7</sup> "Legal Regime Regulating Cyber Obscenity and Freedom of Expression" Ramadevi Gudemela, available at <http://www.udgamvigyati.org/admin/images/Legal%20Regime%20Regulating%20Cyber%20Obscenity%20and%20Freedom%20of%20Expression%20-%20Ramadevi.PDF>

<sup>8</sup> AIR 1965 SC 881.

<sup>9</sup> AIR 1986 SC 967.

<sup>10</sup> Section 2 (c) of Indecent Representation of Women (Prohibition) Act, 1986 defines the indecent representation of woman.

<sup>6</sup> <https://blog.ipleaders.in/cyber-pornography-law-india/>

Indian Parliament instituted The Protection of Children from Sexual Offences Act, 2012. This Act gives insurance to the children against offences of pornography, inappropriate behaviour and rape, and so on. The case of *Kamlesh Vaswani v. Union of India* <sup>[11]</sup> is as of now forthcoming in the Indian Supreme Court. The Apex Court has guided State to document a definite affirmation and offered a conversation starter whether the Department of Telecom (DOT hereinafter) or some other division of Indian Government is able to give headings to Internet Service Providers Association of India (ISPAI hereinafter) to cancel sites indicating pornography <sup>[12]</sup>.

In India, the Information Technology Act, 2000 (IT Act hereinafter) contains the issue of online obscenity. Under the Act, putting away or a private survey of obscene material is legal as it doesn't specifically confine it. Then again, sending or distributing the obscene material is illegal. Prior to 2008, section 67 was the solitary arrangement of the Information Technology Act which disallowed the distribution of obscene data including child pornography and obscenity. Section 67A of the IT Act, 2000 specifically limits the distribution of sexually express or obscene material and section 67B of the Act specifically precludes child pornography. This section just condemns the distribution and transmission of sexually unequivocal or obscene material in an electronic structure yet seeing, downloading, ownership and so forth isn't an offence according to the arrangements of the Act.

The principle fundamentals of section 67 of the IT Act are (a) transmission of the data in an electronic structure and (b) that distribution advances to lecherous and prurient interest. This offence is bailable, cognizable and offence by the court of Judicial Magistrate of First Class <sup>[13]</sup>. A clarification proviso is also added with this section which states the significance of the word utilized in section 67.

*State of Tamil Nadu v. Suhas Kutti* <sup>[14]</sup> is the primary instance of conviction under section 67 of IT Act, 2000 in India. For this situation, some disparaging, obscene and irritating messages were posted about the casualty on a yahoo informing bunch because of which the casualty began accepting irritating calls. She recorded a FIR and denounced was seen as liable under sections 469, 509 of the Indian Penal Code 1860 and section 67 of the Information Technology Act.

In *Avinash Bajaj v. State (NCT) of Delhi* <sup>[15]</sup> case, obscene material was set available to be purchased by one individual on the website Baazee.com and offered/transmission of these clasps to a few people dwelling in different pieces of the nation in an extremely brief span. The issue was raised whether it was a distribution under section 67 and the website had in a roundabout way distributed the material. The court held that a definitive transmission of obscene material wouldn't have been conceivable without starting assistance by the website and consequently, the website was held at risk under the section.

Section 67-A was included the Information Technology in the time of 2008. It forbids distribution and transmission of

sexually express material in electronic structure. And this section contains a few exemptions on the line of section 292 of the Indian Penal Code, 1860.

As we probably are aware, India is a signatory to the Convention on the Right of the Child (CRC hereinafter) and ratify the discretionary convention on the state of children, child prostitution and child pornography. Thus, section 67-B was added to the IT Act, 2000. Section 67-B condemns each kind of pornography.

Section 67A and 67B are the solitary sections which are non-bailable according to section 77B of the Act, though others are bailable. We also have section 69-An of Information Technology Act, 2000 where Central Government or it is official delegated can give headings to other government organizations and mediators to impede such data for free if it is in light of a legitimate concern for the State.

Obscenity is an all around the world perceived complex issue which has pulled in the consideration of legal scholars, lawmakers and society on the loose. It tends to be stated that what is improper for one may not be so for other or other society. Because of the most recent innovation, individuals are turning out to be more force situated step by step with the full awareness of their opportunity as opposed to their obligations to keep up the ethical standards, goodness, harmony and request and to observe the law in the nation. Most importantly, the legal executive is one among three organs of the public authority which plays out the capacity of keeping up harmony and request in the society and it is left to it for the upkeep of the explanation just as a judicious store of good standing in the society for managing obscenity in cyberspace.

### Law Pertaining To Electronic Media and Cyber Obscenity

Concerning the law relating to the offence of cyber obscenity, S.67 and S.67A of the Information Technology Act, 2000 are the primary arrangements managing an obscenity on the internet in India. These sections manage obscenity in electronic circles and give discipline to distributing or sending obscene materials in electronic structure. Discipline for distributing or communicating of material containing sexually unequivocal act and so on, in electronic structure stretches out from three to seven years of detainment and fine going from five to ten lakh rupees. Nonetheless, it should be noticed that the test to decide the offence of cyber obscenity according to the Information Technology Act, 2000 has indistinguishable fixings as given under Section 292 of the Indian Penal Code, 1860. Indeed, even the term 'profanity' can be deciphered in order to fall inside the review of the meaning of obscenity. Also, the legal understanding of pornography and obscenity have frequently covered with one another <sup>[16]</sup>.

The Code in specific doesn't set out any test to decide Obscenity. It simply restricts the deal or appropriation or show of obscene words, and so on in broad daylight places. Thus, this test would include examination of whether the inclination of the issue charged as obscene is to debase and ruin those whose psyches are available to such corrupt impacts and into whose hands a distribution of this sort is probably going to fall. This test is like the test set forth in

<sup>11</sup> Vakul Sharma, Information Technology: Law and Practice 191 (Universal Law Publishing, edn. 4<sup>th</sup>, 2015).

<sup>12</sup> Ibid.

<sup>13</sup> Section 67 of Information Technology Act, 2000 (Act 21 of 2000).

<sup>14</sup> Cr. Comp 4680/ 2004, (CMM, Egmore), <http://lawnn.com/tamil-nadu-vs-suhas-kutti/>

<sup>15</sup> (2005) 3 CompLJ 365 Del.

<sup>16</sup> Cyber obscenity and victimisation of women in India, Yeshwant Naik, available at <https://blog.ipleaders.in/cyber-obscenity/>

the decision of R. v. Hicklin wherein, the Court held that "a distribution or substance is obscene if it will in general deliver salacious musings and stirs lewd longing in the brains of considerable quantities of that public into whose hands the book is probably going to fall. Henceforth, the right to speak freely of discourse and articulation is limited in light of a legitimate concern for respectability and ethical quality." However, the Supreme Court is of the opinion that there is no fixed standard to determine what is good and what is fair. The standard of ethical quality shifts every once in a while and here and there. The Courts observation cannot be discarded since birth control which was once considered immoral is now considered moral and a means to control over population. Similarly, kissing or hugging scene in Indian cinema has now come to be tolerated by urban viewers but countryside viewers still do not approve such film scenes.

The Supreme Court again in the year 2007 while perceiving the privilege to grown-up diversion looked into the situation of law on obscenity and summed up the test with respect to obscenity. According to this test, the image of a woman in naked/semi-bare isn't, in essence, obscene except if there is something in it which would annoy the flavour of a conventional well disapproved of individual. The court was more referring to the content. In the sense, the content is regarded as obscene only when treatment of sex becomes offensive to public decency and morality, judged by the prevailing standards of morality in the society. The Court did not define pornography, neither did it explain the meaning of sexually explicit content, but from the explanation for understanding the meaning of obscenity, it is clear that not all contents which have some sexual flavor can be regarded as obscene. In this way, the meaning or interpretation of obscenity can be subjective depending on the culture. Even the definition of 'decent minded person' would also differ as per culture. In this way, obscenity can take various shades. Cyber obscenity being one among several others. According to Citron, cyber hate speech and verbal sexual abuse targeting women is more distressing than other forms of online offences

In 2008, the Indecent Representation of Women (Prohibition) Act came into effect to include such acts of representation of women, which did not fall within the ambit of obscenity. But matters pertaining to cyber obscenity are still not included in the said Act. The Act focuses only on print media. It does not have sufficient powers to deal with the electronic media, the internet and mobile phones. This shows online sexual abuse or harassment is not taken that seriously as other forms of abuses. Till today the legal trend in this sphere has proved to be ineffective in assuring fair justice to women. Even the judiciary has not adequately considered the ways in which woman can be abused and subjected cyber obscenity. Thus, the victimization of women still continues in silence.<sup>17</sup>

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<sup>17</sup> <https://blog.iplayers.in/cyber-obscenity>