

## **“The Dark Side of Cyber Pornography”**

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### **ABSTRACT**

In the present scenario of online dependency, vast amount of the information is available online and hence prone to cyber threats. This paper focuses on cyber pornography as a new set of crime within the term cybercrime which is basically carried out by information and communication technology. This paper outlines the most controversial issue of child pornography. Further the paper discusses about the legal position of cyber pornography to identify Current Scenario in India; in other Developed Countries. The paper the dark side of cyber pornography considers the banning of Cyber Pornography in India; the role of service providers. In addition to this it also takes into account the amendments related to Information Technology Act, 2000 for more stringent rules and Regulation, fair prosecution and conviction of offender who has committed offences of Cyber Pornography. This paper discuss about the measures taken by police authorities for more effective and quality investigation; need of creating awareness and educating parents to have a tight control over use of Internet and other modes of communication technology and cyber cafe's to take preventive measures to curb cyber pornography. However, the paper contain certain recommendations which helps to fight against offences related to cyber pornography.

**KEYWORDS:-** Cyber pornography, education

### **INTRODUCTION**

This paper focuses on the widespread use of the internet facilities which have brought challenges related to cybercrime in the process of development of information and communication technology. The Oxford Dictionary defines Pornography as “printed or visual material containing explicit description or display of sexual organs or activity intended to stimulate sexual excitement”.<sup>1</sup> Further, the Black’s law dictionary defines Pornography as “Lewd and lascivious materials depicting erotic images, designed to arouse sexual desire”.<sup>2</sup>

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<sup>1</sup><https://en.oxforddictionaries.com/definition/pornography>

<sup>2</sup><https://dictionary.thelaw.com/pornography/>

The Internet technology is an instrument of communication through which citizens mostly from the younger generation are using it in a wrong way and for unlawful purposes which is affecting their innocent minds and degrading their morals. In the recent years, cyber pornography has been arising as one of the most burning issue related to the internet. Internet is a multi-national platform where every country is having different social, cultural, political, economic, moral and legal structure, so it is very difficult to consider the “pornographic content” because one country might consider such obscene as lawful while others may not. Cyber pornography is a criminal offense which causes harm to people by displaying, creating, disseminating or publishing any indecent images with use of internet. To handle issues related to cyber pornography there has been various laws, recommendation and attempts taken by government and law enforcement agencies across the globe.

### **CYBER PORNOGRAPHY**

Cyber pornography means an act by using cyberspace to create, display, distribute, import, or publish obscene materials, especially materials related to children who are engaged in sexual acts with adults.<sup>3</sup> Pornography is a criminal offence which has been considered as one of the corrupt demonstration causing harm to people.<sup>4</sup> There are distinctive destinations which demonstrates diverse obscene material as pictures and short energized films, to sound records and stories, clients utilize the internet to make sex, sexual life, sexual acts and to orchestrate sexual exercises from computer screen.<sup>5</sup>

Internet as a mode encompasses vast knowledge and information for the individual and as a result of these crimes related to cyber obscenity is not distant to it. Easy accessibility has made it more convenient for individuals to have access to internet easily. In *Regina v. Hicklin*<sup>6</sup> the first test of obscenity was laid down as the tendency to deprave and corrupt those whose minds are open to such immoral influences and into whose hands a publication of this sort may fall. Cyber pornography is recognised under ‘.xxx’ domain by ICANN (Internet Cooperation for Assigned Names and Numbers) which is approved by Uniform Domain Dispute Resolution Policy, for resolving disputes regarding domain names.<sup>7</sup>

Cyber space is an instrument for Cyber pornographers who for their enjoyment disseminate and distribute or sell their products to paedophiles, thus paedophiles visit online chat room in an attempt to engage innocent children into spot for sexual activities.<sup>8</sup> This alone constitutes as an offence for the act of luring a child into situation of sex, thus such acts are prohibited

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<sup>3</sup>Cyberpornography, Your Dictionary, [Http://Www.Yourdictionary.Com/Cyberpornography](http://www.yourdictionary.com/cyberpornography)

<sup>4</sup> *Supra* note 1.

<sup>5</sup>Mu’azu Abdullahi Saulawa, Cyberpornography:An Analysis Of The Legal Framework, Vol.3 Eajournals, April 2015, At 46.

<sup>6</sup> *Regina v. Hicklin*, (1868) LR 3 QB 360.

<sup>7</sup> Kartar Ramnani & M.Shivashritha, Jurisprudential Dimensions Of Cyberspace, Vol. 4 Issue 4 Issn 2347-3185, Ijra, 2017.

<sup>8</sup> Mu’azu Abdullahi Saulawa, *Supra* Note 3, At 46.

and in some instances the paedophiles who are engaged in chatting with a teenager on the internet suggests a meeting or visiting a minor's home in the name of sex engagement.<sup>9</sup>

The evolution of cyberspace has transformed the traditional pornographic content into digital pornographic content which assists the paedophiles in wide distribution, circulation of pornography materials.

### **CYBER CHILD PORNOGRAPHY**

At global level child cyber pornography is one of the controversial topic. Article 2 of the Optional Protocol defines child pornography as “any portrayal, by whatever methods, of a child occupied with genuine or mimicked express sexual exercises or any portrayal of the sexual parts of a kid for principally sexual purposes.” The Child pornography includes acts such as sexual explicit pictures of children which end up exposing these vulnerable children to unsuitable material, Physical Harassment, and affects their emotional senses as well.

Kids being defenseless and guileless ought to be shielded from the universe of wrongdoing and shady individuals. Children are the most innocent and weak section so attention should specially be given for the protection of their rights. Because of their defenselessness they effortlessly fall in the pit openings of tyke misuse, youngster trafficking, tyke smut, asking and such different wrongdoings.

It is very easy for the criminal minded people to befriend the young minds to lure them with their cheesy talks and ultimately make them act according to their whims and fancies for their own ulterior motives. The internet and social media have become appealing platforms due to which the young child does not give a second thought about the other dark side of this attractive world. Sometimes they are lured or sometimes because of a certain weak point they are blackmailed or many time their loneliness, working schedule of parents, neglect by parents and an unruly exposure to the internet.<sup>10</sup>

Child pornography is material “that visually depicts sexual conduct below a specified age”. Along with the paedophiles involved in heinous and abhorrent crimes the porn industry has also become very remunerative these days. Such industries are running over the globe in a very organised manner and the young children are their miserable victims.

Peer pressure being another reason for the expansion of child pornography. Sextexting these days have become a common practice among the young children which means the practice of sending and receiving sexually explicit and obscene pictures via mobile phone which as a result is accessible to the predators of child pornography because of the cyber space. Suicide as a result of bullying is one of the harsh consequences of cyber pornography.

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<sup>9</sup>Id. At 46.

<sup>10</sup> Nuzhat Parveen Khan & Nida Zainab Naqvi, Child Pornography In Digital Age And The Law In India – Analysis, ISSN 2330-717X ,September 1,2018, <https://www.eurasiareview.com/03052017-child-pornography-in-digital-age-and-the-law-in-india-analysis/>

As per the Article 9 of the Cyber Crime Convention, 2001, child pornography includes: “obscene material that outwardly delineates: a minor occupied with explicitly express lead and a man having all the earmarks of being a minor occupied with explicitly unequivocal direct, the term “minor” shall include all persons under 18 years of age”.<sup>11</sup> Article 9 of this Convention also provides for the punishment related to child pornography.

Child Pornography under Section 67B of the Information Technology Act, 2008<sup>12</sup> depicts punishment for distributing or transmitting of material of youngsters occupied with explicitly express act, making content or advanced pictures or publicizing or advancing such material portraying kids in vulgar or disgusting way, who makes content or computerized pictures, gathers, looks for, peruses, downloads, promotes, advances, trades or disseminates material in any electronic shape, develops, tempts or initiates kids to online association with at least one kids for and on explicitly unequivocal act or in a way that may outrage a sensible grown-up on the computer resource.<sup>13</sup> shall be punished on first conviction with imprisonment of either description for a term which may extend to five years and with a fine which may extend to ten lakh rupees and in the event of second or subsequent conviction with imprisonment of either description for a term which may extend to seven years and also with fine which may extend to ten lakh rupees.<sup>14</sup> For the purposes of this section, "children" means a person who has not completed the age of 18 years.<sup>15</sup>

The Protection of Child from Sexual Abuses Act, 2012 also provides for punishment regarding child pornography.<sup>16</sup> Section 13 to 15 provides for punishment for using a child for pornographic purposes and punishment for storage of pornographic material involving a child.<sup>17</sup>

In *Kamlesh Vaswani v. Union of India*<sup>18</sup>, it was held that, the sites indicating child pornography, particularly of kids between 14 to 18 years ought to be entirely prohibited. The court additionally laid emphasis upon the significance and desperation of the issue and held that, all gatherings by the said arrange must find a way to attempt and contain the hazard of child erotic entertainment.

The Bombay High Court Committee on Protecting Children from Online Pornography, suggested recommendations in their Report on Protecting Children from Online Pornography

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<sup>11</sup>Budapest Convention on Cybercrime,ETS-185, 23.XI.2001,  
[http://www.europarl.europa.eu/meetdocs/2014\\_2019/documents/libe/dv/7\\_conv\\_budapest\\_/7\\_conv\\_budapest\\_en.pdf](http://www.europarl.europa.eu/meetdocs/2014_2019/documents/libe/dv/7_conv_budapest_/7_conv_budapest_en.pdf)

<sup>12</sup> The Information & Technology (Amendment)Act,2008, Acts of Parliament, 1992 (India).  
[http://nagapol.gov.in/PDF/IT%20Act%20\(Amendments\)2008.pdf](http://nagapol.gov.in/PDF/IT%20Act%20(Amendments)2008.pdf)

<sup>13</sup> *Supra* note. 11 at 6.

<sup>14</sup> *Id.* at 6.

<sup>15</sup> *Id.* at 6.

<sup>16</sup>Khan and & Naqvi, *supra* note 10.

<sup>17</sup> *Id.*

<sup>18</sup> Kamlesh Vaswani v. Union of India (2014) 6 SCC 705.

such as Blocking of sites; Preventing minors from accessing unsuitable material from Cyber Cafes and Preventing the publication or propagation of pornography from Cyber Cafes.<sup>19</sup>

### **CYBER PORNOGRAPHY IN INDIA**

In India, the Cyber pornography is neither legally recognized nor fully prohibited under the Information Technology Act, 2000. Under the IT Act transmitting or publishing of any pornographic material is illegal. The sections in the Information Technology Act, 2000 which prohibits cyber pornography but with certain exceptions to them are- Section 67 & 67A;

Section 67 deals with publishing or transmitting obscene material in electronic form.<sup>20</sup> The Information Technology Amendment Act 2008 has also included child pornography and retention of records by intermediaries. Whoever publishes or transmits any material which is lascivious or appeals to the prurient interest or if its effects tends to deprave and corrupt the mind of persons who are likely to read, see the pornographic matter contained in it, shall be punished with imprisonment for a term upto three years which may extend to five years and fine of five lakh rupees which may extend to ten lakh rupees or both.<sup>21</sup> The term Publication include any material whenever transferred on a site, twitter or WhatsApp gathering or some other person to person communication destinations or any advanced entryway through which outsiders will approach such material. The term Transmission include dispersing any material having indecent pictures to any individual through email, messages, WhatsApp or some other type of advanced gateway.

This Section gained importance after the landmark judgement in the famous case of State of Tamil Nadu vs Suhas Katti on 5 November 2004, the prosecution proved the reliability of electronic evidences and on that basis conviction was given in this case, which involves sending of obscene messages in the name of a married women which amounts to cyber stalking, email spoofing and other criminal activity.<sup>22</sup>

Section 67-A deals with distributing or transmitting of material containing explicitly express act in electronic frame.<sup>23</sup>

Section 67C force the duty on the delegates that they will protect and hold such data as might be indicated for such length and in such way as the Central Government may recommend.<sup>24</sup> Non-compliance is an offence which draws in detainment upto three years or fine.<sup>25</sup>

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<sup>19</sup>Khan and & Naqvi, *supra* note 10.

<sup>20</sup> Cyber laws in India, TaxMann Publishers, <http://iibf.org.in/documents/Cyber-Laws-chapter-in-Legal-Aspects-Book.pdf>

<sup>21</sup> *Supra* note 6, at 9.

<sup>22</sup> *Supra* note 7, at 9.

<sup>23</sup> *Id.* at 9.

<sup>24</sup> [http://nagapol.gov.in/PDF/IT%20Act%20\(Amendments\)2008.pdf](http://nagapol.gov.in/PDF/IT%20Act%20(Amendments)2008.pdf)

<sup>25</sup> *Id.*

In *Avinash Bajaj v. State*<sup>26</sup> was arrested for an advertisement by a user to sell the DPS sex scandal video.<sup>27</sup> The video was not uploaded on the digital portal, despite that Avinash was arrested under Section 67 of the Information Technology Act.<sup>28</sup> It was subsequent to this case that the Intermediary guidelines were passed in 2011 whereby an Intermediary's liability will be absolved if they exercised due diligence to ensure obscene content is not displayed on their portal.<sup>29</sup>

The sections relating to Cyber Pornography i.e., Section 67A and 67B are non-bailable as per Section 77B of the Act, while others are bailable.

Section 69A- This section empowers the Central Government or its designated officers to issue bearings to different offices of Government and Intermediaries to square free to any such data which influences the sovereignty and respectability of India, protection of India, security of the State, neighborly relations with outside states or open request or for averting actuation to the commission of any cognizable.<sup>30</sup>

In *Aveek Sarkar & Anr vs State Of West Bengal And Anr* on 3 February, 2014<sup>31</sup>, Justices K.S. Radhakrishnan and A.K. Sikri upheld and ruled that if any picture or article contain lascivious material which appeals to prurient interests and tends to deprave and corrupt those likely to read, see or hear it, would be deemed to obscene.<sup>32</sup> The court additionally said that "A photo of a bare/semi-naked lady... can't in essence be called revolting... . Just those sex-related materials which have a propensity of 'energizing indecent considerations' can be held to be revolting, yet the profanity must be made a decision from the perspective of a normal individual, by applying contemporary network standard".<sup>33</sup>

As per the Indian Penal Code, 1860 Section 293 "whosoever sells, lets to hire, distributes, exhibits or circulates to any person under the age of twenty years any such obscene object, as is referred to in IPC Section 292, or offers or attempts so to do, shall be punished with imprisonment for a term which may extend to three years, and which fine which may extend to two thousand rupees, and, in the event of a second or subsequent conviction, with imprisonment of either description for a term which may extend to seven years, and also with fine which may extend to five thousand rupees. It is a cognizable offence". Section 292(2) IPC "says that, a book, handout, paper, composing, drawing, painting portrayal, figure or some other protest, will be esteemed to be indecent in the event that it is scurrilous or

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<sup>26</sup> Avinash Bajaj v. State, 29 May, 2008 (India), <https://indiankanoon.org/doc/309722/>.

<sup>27</sup> Puneet Bhasin, Cyber Pornography Law in India- The Grey law decoded, Sep. 1, 2008, <https://blog.ipleaders.in/cyber-pornography-law-india/>

<sup>28</sup> *Supra* note 12.

<sup>29</sup> *Id.*

<sup>30</sup> *Supra* note 12.

<sup>31</sup> *Aveek Sarkar v. State of W.B.*, (2014) 4 SCC 257 (India).

<sup>32</sup> Rajas C. Pingle, Cyber Pornography, *lawyersclub India*, (Aug. 28, 2018), <http://www.lawyersclubindia.com/articles/Cyber-Pornography-6396.asp>

<sup>33</sup> *Supra* note 32.

requests to the lewd intrigue or if its impact, it will be rebuffed with detainment, for the primary example, of either depiction for a term which may reach out to two years, and with fine which may stretch out to two thousand rupees, and, in case of a second or resulting conviction, with detainment of either portrayal for a term which may stretch out to five years, and furthermore with fine which may stretch out to five thousand rupees”.

### **CYBER PORNOGRAPHY IN DEVELOPED COUNTRIES**

Cyber pornography is banned in some countries whereas legalized in some. In United States of America, the Internet pornography is legally recognized as an act of prostitution but excluded child pornography from its ambit.

There are three major legislations dealing with the censorship of pornographic material on the internet in the United States: the Communications Decency Act (CDA), which was enacted as a part of the Telecommunications Act of 1996, the Child Online Protection Act 1998 (COPA) and the Children Internet Protection Act 2003 (CIPA)<sup>34</sup>. The CDA sought to prohibit the use of an interactive computer service to send or display in any manner to those under the age of 18, any communication that depicts or displays sexual or excretory activities in a manner that is patently offensive.<sup>35</sup>

In *United States v. Simpson*<sup>36</sup>, case court laid down that “the analysts sworn statement which portrays the prematurely ended exchange consulted in Internet visit space for exchanging of child explicit issue which establish as adequate reason in getting court order against them”.

In *U.S. v. Jesus Norberto Evans-Martinez*<sup>37</sup>, the court held that “the defendant was convicted for sending emails advertising for the creation of a Yahoo! Group for exchanging related to child pornography”.

In *United States v. Kufrovich*<sup>38</sup> case, the accused committed an offence under Section, 2422 (b) and 2433 (b) of the US Criminal Law for using internet communication to knowingly persuade a minor to engage in sexual activity with him.<sup>39</sup> The charged contended with all due respect that his contact with the injured individual was just through the web and not immediate, consequently he was intrinsically ensured under the First Amendment and the discussion through the web couldn't be utilized against him in proof. In any case, the court dismissed his safeguard and held that under the Communications Decency Act, the charges

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<sup>34</sup>Khan and & Naqvi, *supra* note 10.

<sup>35</sup>*Id.*

<sup>36</sup> 355 SCC US 7 (1957)

U.S.A, <http://shodhganga.inflibnet.ac.in/bitstream/10603/70095/6/chapter%205.pdf>

<sup>37</sup> 05-10280, 448 F.3d 458 U.S.A, <http://shodhganga.inflibnet.ac.in/bitstream/10603/70095/6/chapter%205.pdf>

<sup>38</sup>United States v. Kufrovich , 1997 (16) 997 F. Supp. 246 (USA).

<sup>39</sup> Judicial Response On Cyber Crime, at 299,

<http://shodhganga.inflibnet.ac.in/bitstream/10603/70095/6/chapter%205.pdf>

brought against the blamed, criminalizes him for the utilization of web and phone lines to attract a minor into sexual action.

In the case of *Miller Vs State of California* 413 U.S. 15 (1973)<sup>40</sup>, the test has been laid down to determine the legality of pornography, the test dictates that the perspective of the local community on matter related to pornography is very important in determining its legality.<sup>41</sup> Thus, if they find any material as obscene then it is more likely to be banned. Thus, if Miller test would apply to cyber pornography cases, then it reflects only conservative ideology.

In United Kingdom, the possession of any pornographic pictures for personal use is not an offence; however the sale or distribution of hardcore pornography through any channel was prohibited until the rules were relaxed in 2002.<sup>42</sup> The UK citizens were always able to have access to pornography without breaking any laws except child pornography.<sup>43</sup>

In the United Kingdom, the Obscene Publications Act, 1959 has been amended by the Criminal Justice and Public Order Act of 1994 (CJPOA) in order to deal with the problem of cyber pornography by extension of the Act in order to cover the transmission of electronically stored data. It makes intermediaries liable for material placed on the internet by a third party thus requiring them to monitor material for obscene matter. Further the Protection of Children Act, 1978 was amended by CJPOA, 1994 to include photographs in electronic data format.<sup>44</sup>

In Australia, government has implemented the rating based regulatory framework, criminal legislation which prohibits production, dissemination and consumption of illegal pornography.<sup>45</sup>

Article 34 of the United Nations Convention on the Rights of the Child, 1989 provides<sup>46</sup>: States Parties embrace to shield the youngster from all types of sexual misuse and sexual maltreatment. States Parties will specifically take all fitting national, respective and multilateral measures to keep the prompting or intimidation of a youngster to take part in any unlawful sexual movement; the exploitative utilization of kids in prostitution or other unlawful sexual practices; the exploitative utilization of kids in obscene exhibitions and materials.

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<sup>40</sup>Miller Vs State of California, 413 U.S. 15 (1973).

<sup>41</sup>Supra Note 17.

<sup>42</sup>*Id.*

<sup>43</sup>*Id.*

<sup>44</sup>Khan and & Naqvi, *supra* note 10.

<sup>45</sup>*Id.*

<sup>46</sup>United Nations Convention on the Rights of the child ,at 10,<https://www.ohchr.org/Documents/ProfessionalInterest/crc.pdf>

**MEASURES TO CURB CYBER PORNOGRAPHY****Educating the Police on Cyber Pornography Offences for effective and quality investigation**

To curb Cyber Pornography offences, the foremost step is to make more stringent provisions related to conviction which creates fear in mind of offender. This will be possible if the investigating agencies collect direct evidence against the cyber pornographic offender before the Court of Law. The Central and State government should organise courses by engaging Cyber Experts, which provide effective and quality of investigation and evidence gathering related to Cyber Offences.<sup>47</sup>

**Awareness Campaigns for Educating Parents on Parental Control to curb Cyber Pornography**

In this globalized world everyone is using internet technology without any discrimination of gender, age, etc. The large amount of material available on the Internet which is related to diverse fields such as politics, news, sports, education, health, environment and others, but it also contain materials which is not appropriate for children.<sup>48</sup> It affects the psychology of children. Thus, it is very much justified to block and filter technologies which will resolve cyber pornographic problems more effectively and flexibly than any such law.

Therefore, minors are easily exposed to Cyber Pornography which can be effectively tackled by the Government with the help of organising awareness campaigns for educating parents on parental control in curbing Cyber Pornography at their home itself. With the development of software for Parental Control or Antivirus, it is easy for parents to download and install it on their computer and filter the contents for their children.<sup>49</sup>

Guardians and relatives must connect with their young kids to bring issues to light among them about security and misuses including sexual maltreatment and how to keep away from and request help if there should be an occurrence of any endeavor to manhandle.

School experts on their part on the off chance that they see any social change in the understudy they ought to instantly educate the guardians and enquire the youngster in a favorable environment to see whether any maltreatment has occurred.

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<sup>47</sup>*Supra* note 32.

<sup>48</sup>Akdeniz, Y.,Governing pornography and child pornography on the Internet: The UK Approach, Cyber-Rights, Protection, and Markets: A Symposium, (2001)University of West Los Angeles Law Review, at 20.

<sup>49</sup>Akdeniz, Y.,Governing, pornography and child pornography on the Internet:The UK Approach, Cyber-Rights, Protection, and Markets: A Symposium, (2001)University of West Los Angeles Law Review, at 20.

### **ROLE PLAYED BY CYBER CAFE**

The Cyber Café in order to maintain a record of the user identification should either store a photocopy or a scanned copy of the document duly authenticated by representative of cyber cafe. The user identification record to be maintained for at least one year<sup>50</sup>. Along with the user identification documents the web camera photographs authorised by cyber cafe's, shall be part of the log register which may be maintained in physical or electronic form<sup>51</sup>. An adult should accompany the minor without photo Identity card with any of the documents. It is the duty of the Cyber café representative to immediately report to the concerned police, if they have reasonable doubt or suspicion regarding any user.<sup>52</sup>

All the computers in the cyber cafe may be equipped with the commercially available safety or filtering software so as to avoid as far as possible, access to the websites relating to pornography including child pornography or obscene information<sup>53</sup>. Cyber Cafe shall take sufficient precautions to ensure that their computer resource are not utilised for any illegal activity<sup>54</sup>.

### **CONCLUSION AND RECOMMENDATION**

Internet is a “mass” medium of communication with borderless connectivity, where many criminals use it against morality. The Internet technology is an instrument of communication through which citizens mostly from the younger generation are using it in a wrong way and for unlawful purposes which has affected their innocent minds and degrading their morals. In the recent years, cyber pornography has arisen as one of the most burning issue related to the internet.

The investigating agencies in order to protect children from such crimes can coordinate with NGOs, who are working for the welfare of children and prevention of child abuse by foreign nationals.

Revival of the disintegrated joint family system should be done for more benefits including safety of children.

Children should be asked to be careful with the strangers and not to talk to them without presence of an adult.

Media can also play active role in generating awareness in the society about child abuses by giving required publicity about the existing laws against such offences.

Due to lack of education relating to sex young generations are directed towards cyber pornography activities. In this unprotected and unregulated cyber-world children are left with

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<sup>50</sup>The Information & Technology Act,2008,<http://meity.gov.in/>

<sup>51</sup> *Supra* note 29.

<sup>52</sup> *Id.*

<sup>53</sup> *Id.*

<sup>54</sup> *Id.*

paedophiles that lure children. To tackle this problem both National and International community should frame legal provision related to prevention of cyber pornography offences.

Therefore, the international community should strongly propose restrictive measures against pornography films and also on obscene pictures. The paper further recommends that government should develop quick and effective software tracker for parents and others law enforcement agencies.

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