

Chapter-VIII

Conclusion

There is no fix definition of obscenity, it changes with the circumstances of case. Literally the word ‘obscene’ means chastity or modesty whereas legally the word ‘obscene’ means the tendency of which is deprave those whose minds are open to immoral influence. The word “obscene” is very wide term and whatever is “vulgar” and “indecent” should not be construed as such. This is also a global and dynamic phenomenon and can no longer become local and static phenomenon. In identifying the “Obscenity” over internet or cyberspace or on electronic medium, test to be resorted should be the same although manner of investigation and way of prosecution could be different.

For the first time in Ranjit D. Udeshi V. State of Maharashtra the Hon’ble Supreme Court interpreted the word obscene and for this the Apex Court relied on the test followed in the famous Hicklin’s case, But the test given in the Hicklin’s case cannot be followed in every case related to obscenity, because cultural values and moral standard differs from nation to nation, simply sexually explicit is not obscene in Western countries the same may be considered obscene in India. The acceptance of different patternsof elements of ‘decency’ or ‘morality’ differs from country to country.

India has exhaustive culture of various communities and the variation in social attitudes and community standards alter the concepts of obscenity. The words indecency, vulgarity, nudity and pornography are not synonym of word ‘obscenity’.

In the eye of constitution of India both men and women are equal and must be treated in same manner, but in Indian society there is clear distinction between their rules. Therefore to remove this biasness constitution has made certain provisions to favour women. Some of them are Art. 14. Art. 15(i), Art. 15 (3), Art. 16, Art. 39 (a), Art. 39 (d), Art. 42, Art. 46, Art. 47, Art. 51 (A) (e), Art. 243.

In any democracy freedom of speech is the most important. The freedom of speech was explicitly recognized as a fundamental right under Article 19 which can be restricted under Art. 19(2) where several grounds were prescribed including “decency or morality and public order”. This restriction purports to protect people from depravity and corruption by immoral influence. The issue of obscenity and the conflict with freedom of speech and expression has been discussed in detail. Censorship is permitted mainly on the grounds of social

interests specified under Art. 19 (2) with emphasis on maintenance of moral values. The film censor Board is specially entrusted to screen off the silver pictures which offensively invade or deprave public morals through over sex. Today television has become the part of every family, and thus it is responsibility of cable operators not to display obscene, indecent and vulgar programmes. For this central government has made rules known as the cable Television Networks Rules. 1994 which have prescribed a programme code under rule 6.

While the constitution provides guarantee to freedom of speech and expression, which is exercised by the media, the criminal law imposes certain restrictions on that freedom for protecting the social or group interests and public tranquility. Article 19(2) provides certain grounds, basis on which the state can impose reasonable restrictions on this freedom. Media-persons are basically under the same obligation as the people in general to abide by general principles of penal law. Media in its exercise of free criticism may slip either intentionally or through its routine activity into any kind of criminal liability under different circumstances. The Indian Penal code envisages certain crimes which a media person may get entangled into and face prosecution. The right to free speech of media person cannot extend to cause sedition, by bringing disrepute of the state, or affect the reputation of individual leading to defamation or represent obscene or base material disturbing the moral and serene atmosphere of society. In case they do so, the criminal provisions of Indian Penal Code are attracted. Thus Defamation, Sedition and Obscenity are the three major areas where the media persons could be vulnerable to face the prosecution.

The government is allowed to make policies under these restrictions, which overrides individual and business interests of an individual. The most controversial issue is balance between the flow of obscene material and freedom of expression. The constitution guarantees freedom of expression but state may impose reasonable restriction in the interest of public decency and morality.

Art. 21 guarantees protection of life and personal liberty, it also includes right to live with dignity and decency. The obscene representation of women by media debase and degrade the women. Hence the basic right of the women guaranteed under article 21 is violated.

Constitution of India impose some duties on its citizen. Article 51 A deals with such duties. This Article in cl (e) levies duty on us to renounce practices that are derogatory to the dignity of women. Therefore, if media tends to practice derogatory to the dignity of woman in any manner should be constitutionally prohibited.

The indecent representation of women Act 1986 is a pioneering legislation to prohibit the indecent representation of women through advertisements, books, pamphlets etc. It is well known proposition of law (generalia specialia non derogant) that when a matter falls under any specific provision then it must be governed by that provision and not by the general provision.

However the act primarily relates to the print media. There is need to amend the indecent representation of women Act 1986 because since the enactment of the act, technological revolution has created new forms of communication such as internet, cable television, mobile phone, MMS, SMS and satellite based communication. The World Wide Web and Internet is very complex network and is vulnerable to several illegal activities. It is a strong medium of doing illegal activities especially cyber pornography, as "*Internet is very prone to porn*". In the wake different electronic instruments having potential to be used as "Computer" and are getting connected to such a complex network, it is posing more threats and challenges before the law to deal with all such electronic instruments and in a real sense it is the test of the law to lay down a test, to decide obscenity on internet or in electronic form.

Thus it is the need of time to wide the scope of law and to strengthen the existing safeguards to prevent indecent representation of women through any media. The existing legislations such as the IT Act 2000, Cinematograph Act 1952 and sections 292, 293 IPC has provisions to deal with obscenity but had limitations as none of them referred specifically to indecent representation of women. There is no specialized agency for registering complaints regarding indecent representation of women. The word indecent representation and exploitation are often looked together both have different concept and it is essential to differentiate them. Indecent Representation of Women Act did not apply to films. It is necessary to have same level of scrutiny for deterring indecent representation of women.

There are several laws in India to prohibit the obscenity some of them are The Post office Act 1898 which prohibits the transmission of obscene matter over post, The Dramatic performances Act, 1876 which prohibits public dramatic performances which are scandalous, defamatory, seditious or obscene, The customs act 1962 to prohibit importation or exportation of obscene literature, The Press council of India Act, 1978 which prohibits the publication of any things which is obscene, vulgar or offensive to public good taste, The Young persons (Harmful Publications) Act 1956,which prevent the dissemination of certain publications harmful to young persons, The Emigration Act, 1983 which prohibit emigration of any class or category of persons if proposed work is considered

violation of public interest, public policy or human dignity and decency, The Inter state migrant workmen Act 1976, which prevents the trafficking of women in to the bars, National Commission for women Act, 1990 which ensure constitutional rights of women, Protection of Human rights Act. 1993 which provides rights relating to life, liberty, equality and dignity of an individual. Beyond these enactment there are many regulatory bodies and social organisations which curb indecent representations of women.

Herewith on the basis of literature available on the topic, a detailed study, understanding and analysis thereof, following points can be elucidated:

The Indecent Representation of Women Act (IRWA) was enacted in 1987, supposedly in response to demands from the women's movement to tackle the derogatory depiction of women in the media. Since its enactment, the IRWA has been criticised by many feminists and persons within the women's movement for a number of different reasons:-

- (1) Curtailing the constitutional right to freedom of speech and expression.
- (2) Framing the debate around sexist representations in terms of women's shame and honour, as well as public morality.
- (3) For being used to camouflage a deep discomfort with women's sexuality.

Instead of taking this criticism on board, the National Commission for Women (NCW) has drafted amendments to the IRWA that seek to broaden the definition of 'indecent representation', expand the scope of the Act to include electronic and digital media, and make more stringent the punishment prescribed by the law. The most troubling part of the amendments is the proposal to expand the definition of 'indecent representation of women' to include "the depiction of women as a sexual object which is lascivious or appeals to the prurient interest". Besides widening the scope of the existing law, this will cloud the distinction between existing laws relating to obscenity and the IRWA.

The National Commission for Women has proposed that the existing definition of 'advertisement' in the IRWA be expanded to include 'laser light, sound, fibre optic, electronic or any other media'. The NCW has recommended amendments to the Indecent Representation of Women Act, broadening the definition of "indecent representation" and introducing more stringent punishment under the law. It has recommended the inclusion of electronically and digitally conceived files distributed through audio-visual media, including computer and satellite-connected intra or Internet communications. It has suggested that the

maximum fine for a repeat offender be increased from Rs 10,000 to Rs 500,000. Vyas has been reported as saying that the NCW is in favour of increasing the term of punishment and penalty from two years to five years, and from Rs 2,000 to Rs 10,000.

The Indecent Representation of Women Act, 1986, the provisions of IPC, 1860 are unable to deal with cyber obscenity and at the same time Indian IT Act/Law of 2000/ 2008 also getting it difficult to identify and curb the obscenity on Internet by considering the very complex nature of Internet and activities on it. The legislators, while formulating law on “Obscenity” (on Web) and the Judiciary while interpreting the code of Online-obscenity has to take into consideration the traditional test of obscenity i.e. contemporary community standards. Recognition of obscenity in a so-called obscene material should not be at the cost of the art, literature and freedom of speech and expression unless and until it is required by reasonable restrictions under Article 19(2) of the Indian Constitution. Blocking Websites, regulating and providing checks & guidelines for intermediaries, (including Internet Service Providers, Search Engines, Cyber Cafes or any other person or authority) preventing the publication of or propagation of pornography from certain forums would be the viable option to regulate the same.

It is a sad commentary that despite the Constitutional articles, legislative provisions, codes, self regulations, and various regulatory bodies, both Print and Electronic Media continue to portray obscene images of women. They focus on sex appeal or physical beauty of women. Transnational companies and their advertisements do have a negative persuasive effect on the viewers of our country, especially youngsters. Then, are given clinched argument by the media that they dish out what the people want. It is because of the non-implementation of our laws in this regard rigorously both in letter & spirit demonstrative of our belief more in breach than in adherence. The most important reason for the rapid rise in obscenity in Indian films is a legal regime that has undermined the whole notion that illegal obscenity can be prosecuted. It is high time now and here to uproot this evil at all levels with stiffness and strict and sincere implementation of laws thereto, else we should stand to be blamed for generations after generations for our instead of rich social and cultural heritage, passing on to these the vulgarity & obscenity with lewdness and licentiousness of the meanest order.

We cannot be mute spectators to the indecent representation of women. It is our duty to take cognizance of the activities that destroy the very foundation of Indian society and its culture. Media is an agent to alarm policy makers to give immediate attention to gender related problems such as the adverse sex ratio, infant and maternal mortality, crime against women, gender violence, acid attack,

dowry related problems, problems of the girl child, women labour problems, effects of poverty on women and their families. Unfortunately such coverage is very less in compared to the space covered by cinema, actresses, models, advertisements, glamour, beauty aids, cookery and fashion. The struggle for a fair and just portrayal of women in media is an ethical duty of the Fourth Estate. It is also accountable to the people and it is to act as a watchdog of justice and guardian of the public interest. On 9th March, 2010, Media watch dogs were set up in various cities for continuous and sustained monitoring of portrayal of women in the media. This was a joint collaboration between the National Commission for Women, the various State Commissions in different parts of the country and several non-government organisations working for the empowerment of women. Also, the groups lobbied for changes in the various acts pertaining to proper representation of women in the media like the Indecent Representation of Women Act, 1986 and the Cable TV Network Regulation Act. As an important agent of socialization shaping of gender roles, its mechanisms for checks and balances with respect to gender need to be strengthened. Media can play an important role in protesting the indecent representation of women in the media. So a sincere attempt should be made to provide constructive suggestions and guidelines for the emergence of a healthy media industry.

The advertisements portraying women in a vulgar way, whether it be in hoardings or in other media, is tolerated and over looked by the people. While the public can play an important role in curbing the indecent representations of women in advertisements, by objecting to it and by choosing not to remain silent. Cultural as well as religious constraints too cannot be over looked totally by the agencies. In these circumstances a writ of mandamus can be resorted to. I would like to point out that a mass awakening only can make a change in the attitude of advertisements towards women. Public service advertisements are doing their part- thanks to the Governments and NGOs. But women organizations, police, politicians, social workers, legal activists- all have to join hands to fight those indulging in indecent representation of women in advertisements.

It is evident that we need to have an improved check on obscenity in advertisements. This warrants a question as to how it should be done. There have been various demands of making ASCI a stronger body by vesting in it certain statutory powers. Considering that seventy-five percent of the advertising sector is regulated by ASCI as well as the fact that the Cable Television Networks (Amendment) Rules, 2006 stipulates that all the advertisements will have to abide by ASCI's Code for Self-Regulation in Advertising, it seems that ASCI is the body which should regulate obscenity in Indian advertisements in future as well.

The legal provisions dealing with obscenity are ineffectual. The law looks at technology and media of 21st century with the punitive system of 19th century to create a very suppressive and conservative sexual morality. The police and legal forces wrongly assume its role as a super cop of the morality and their task is to bring culprits to courts thereby pitting officials against media. Criminalizing porn only drives the business underground. The fruits of illegality will be crime, exploitation, black market. There will be rise of the mafia, street violence to capture markets, corruption of the police, legal system, and the bureaucracy, untold deaths due to illicit liquor. In the final analysis, prohibition has done more damage, not just to the treasury, which is of the least consequence, but to families and communities, the alleged beneficiaries of the ban. The law of unintended consequences is far more potent in case of good-intention laws.

What we need to do, or what we need on priority basis is, to have a well-equipped, well informed and trained Enforcement Mechanism including Police Authorities, since they are the ones who are directly responsible for the prevention, detection, investigation, and enforcement of prosecutions of or cases of Cybercrimes including that of Electronic/cyber obscenity or pornography. Because of flawed or weak investigation, there may be chances or possibility of offenders escaping their liability whether before or during trial, considering the complicated nature of Cyber investigation.

Efforts are on globally to protect, provide and promote dignity of women and their rights and several measures have been taken in that regard. The Ministry of Information and Broadcasting's proposed Content Code, which, along with its proposed Broadcasting Bill, is aimed at consolidating existing broadcasting laws, says that the content of broadcasting channels cannot "present the figure of a woman, her form or body or any part thereof in such a way as to have the effect of being indecent or derogatory to women or depict women as mere objects or symbols of sexual desires or behaviour".

The enforcement of laws against obscenity depend first on the Government departments entrusted with the task and when they fail to do so, with courts of law. In India, the judiciary is the ultimate guarantor of Fundamental Rights and is the guardian of the Constitution. Naturally, the judges have a special role and responsibility in correcting the distortions in law enforcement and upholding the rights of women who approach the courts.

Publication of pornography on computer, computer system and computer network located in India as well as on the foreign sole has been made punishable,

but the act of accessing such material on the computer network has not been made a punishable offence.

In most of the cases of obscene and objectionable exposure of women, women voluntarily exposes themselves upto the offensive extent to gain a handsome amount as well as to be popular. For example - “Suny Lione”, a film actress of bollywood. Recently in May 2015 there was a news that the Censor Board has denied to pass the film named “Masti Jade” due to many indecent and vulgar scenes of the actress “Suny Lione” and asked to cut all those scenes. Again, after few days, another news came in the light that a case has been registered against 34 years old film actress “Suny Lione” in Dombivali police station on 14-05-2015 under different sections of IPC, IT Act and Indecent Representation of Women Act on the complaint of a house wife named Anjali Palan. She complaint that during internet surfing she has seen so many indecent and obscene poses and photos of this actress “Suny Lione”. According to the complainant such obscene poses and photos of “Suny Lione” also appears in her self web-site. She alleged that these type of obscene scenes adversely affects the minds of youngsters. No doubt that such type of women or a curse to society who deteriorate the dignity of women for some self economic gain and feels no responsibility towards her respected community.

Various legal provisions including acts, rules and codes have been made for highlighting Indian scenario against obscenity. But Just by making the laws will not end all the identity crisis that women of India face a conscious effort by all the males, females and society as a whole has to work to solve this prolonged issue of identity of Indian women. legislation alone cannot by itself solve such deep-rooted problems and we have to approach them in other ways too. The solution is to find out the ways to control this sort of indecency and obscenity.

Suggestion

Towards Social Awareness –

(1) Obscenity is causing long lasting damage in society which cannot be checked individually. It needs a Mass Movement through. So the citizen should create Mass Awareness against obscenity. The people should discuss this common Cause with his Family, Friends, and Society and create awareness and a sense of responsibility to do something. People should communicate with those indulging in Obscenity and make efforts to convince them to desist from Obscenity.

(2) There should be a voluntary restraint on the part of the film makers. Self regulation by the film makers is the need of the hour to arrest the growing trend of

displaying obscenity and vulgarity in Indian Films.

(3) The citizen should do social Boycott and Public protest against Violators through Articles, Morcha, Dharna etc. the citizen should organize and Join the Protest Rallies / Mochas wherever possible. The citizen should catalyze similar Movements in all parts of the country and convert this Movement into an All India Movement of crores of well meaning Citizens.

(4) It is the time that people raise their voice against this shameless display of woman's body and her commodification in the name of entertainment, against the shameless and blatant violations of laws, making the society unsafe for our future generation.

(5) Women engaged in offensive representation for economic well being should be realized that empowerment given to them does not mean unwanted social activities those are harmful to society.

(6) The so called social workers, activists, lawyers and media persons should come up to enlighten the society at large about the legal consequences of indecent acts.

(7) A cultural movement regarding the adverse impact of indecent representation of women is required in society. In addition, self realization to feel good and bad, legal and illegal, self control and respect to the womankind is also essential and necessary.

Towards Media -

(1) As concerned and responsible citizens should raise their voice to stop this sex, violence and vulgarity in media including Television, Newspapers, Films and posters of films. People should join hands in this fight against vulgarity and violence in media. People should boycott those Media and News Papers which promote Nudity.

(2) People should approach Associations / Federations of Media for making guidelines for their Members and for ensuring it.

(3) There should be some such T.V. channels that have a fixed time slot, even once a Week that highlight issues faced by women in India.

(4) People should garner Support of Right minded and Like Minded Media. New innovative decent presentation of women, based on Indian culture and society through media must be introduced, simultaneously, western indecent

culture should not be imitated despite accepting dynamic globalization processes. The media should enable projection of women in a decent and dignified way and promote respect and dignity to women avoiding negative portrayal of women. The media professionals need to be sensitised on gender issues and a system of rewards may be developed for those who are able to portray women in positive manner. Likewise, stringent punitive action should be taken against those who defy the norms.

Towards Legal Activities –

- (1) The citizen should write to Hon. Chief minister, Hon. Home Minister, Director General of Police (DGP) and Commissioner of Police, asserting our Right to Live and bring up our children in an atmosphere free of obscenity and violence.
- (2) People should write to Union Minister of Information and Broadcasting Ministry at Shastri Bhavan, New Delhi , and demand that no Adult content should be shown at any time on the television. Demand that all Private TV Channels be converted to Pay Channels so that people can see the channels of their choice only and prevent undesirable channels in their home.
- (3) People should lodge complaints against cases of obscenity wherever they see. The citizen should initiate legal action against violators through Public Interest Litigation.
- (4) Stringent laws are needed to censor advertisements which targets women as an object of marketing their wares irrespective of dignity and ethics of the society. A proper code is needed to be established to eliminate all advertisements pertaining senseless, irrelevant, distracting ideas which lays a strong, adverse impact on the minds of viewers and effect their moral emotions. There are so many laws laid down by the Legislation to regulate advertisements but a major lacuna in the system is needed to stringently enforce these laws. This is expected from the law makers to frame such kind of legislation that puts a limitation on the market strategy of advertisers which prefers to prevail obscene, immorality in public. Advertisements like “Kamasutra Condom”, “Japani Tail”, “japani-F-Capsule” etc tend to degenerate and corrupt our young generation to an immeasurable extent and hence, they should be disallowed by the censor board It is the duty of the government to take certain reformative actions which aim to wipe out illegitimate showbizz from adds world. In addition to this, a panel is ought to be established to supervise and monitor advertisements which focus on women figure in making customers at large scale, and allow them to take strict

steps to ban aforesaid advertisements which are easily encountered on websites, newspapers, magazines, calendars etc.

(5) It is suggested that ASCI(Advertising Standards Council Of India) should *in fact* be given certain binding powers, however, it does not mean that ASCI would be elevated to the position of state. ASCI should be given the power to screen the advertisements before they are aired on television so that the advertisements offending good public taste are not broadcasted at the first place. Apart from this, there should be a robust mechanism which deters the advertisers to air obscene advertisements. ASCI should be conferred the power to impose binding financial sanctions, the amount of which should be reasonably high to deter various advertisers and advertising agencies. However, there is a possibility that those big advertisers and advertising agencies which annually earn crores of profit would easily by-pass such a system of financial sanctions and would keep airing obscene advertisements. To check such advertisers, the ASCI should be linked with criminal courts which can impose criminal sanctions on such advertisers showing recurring obscenity in their advertisements. There should be a swift linkage between ASCI and courts, wherein the former can take the blameworthy advertisers to the Courts and get them punished. Lastly, it is suggested that not only the advertisers who come up with obscene advertisements, but also the television channels which screen such advertisements should be deemed culpable and be subsequently punished. If such suggestions are taken into account and ASCI is made a stronger body, we can regulate the television advertisements thereby substantially curbing the ill-effects of obscene advertising in the Indian society.

(6) There are so many measures provided under various laws regarding media and advertisement that marketers take due care while designing an advertisement ensuring that advertisements are truthful, honest and decent in presentation. But in absence of concrete definition of obscenity the managers of media and market overlook the law and lose the sense of responsibility and accountability. The following should be kept in mind while framing a definition on obscenity.

(a) The definition should be clear. The courts have tried to interpret obscenity basing on the facts and circumstances. But the attempt to provide exhaustive instances of obscenity has been shown to fail. The most practicable alternative is to strive towards a more abstract definition of obscenity which is contextually sensitive and responsive to progress in the knowledge and understanding of the phenomenon to which the legislation is directed.

- (b) While coming up with a definition it should be kept in mind that: Obscenity law should avoid using vague and subjective terms, such as 'indecent' 'absence' and 'harmful to public morals', without providing further clarification. Vagueness is dangerous.
 - (c) Obscenity restrictions must be aimed at preventing real harm and not simply at preventing 'offence to public sensibilities'. Obscenity laws may only restrict material which can be shown to be harmful. Merely offensive material should not be prohibited. (Harm here could mean that it predisposes persons to act in an antisocial manner as, for example, the physical or mental mistreatment of women by men.)
 - (d) It is imperative to distinguish between 'offensive' material from material that is actually harmful, only allowing restrictions which have, as their objective, the prevention of harm.
 - (e) Moral grounds should be concrete problems such as life, harm, well-being, etc and not merely differences of opinion or of taste.
 - (f) A 'community standard of tolerance' test should be taken into consideration. Community standards must be contemporary. Times changes, and ideas change with them. It should be a standard of the community as a whole which must be considered and not of a small segment of a community. The standards of contemporary society in India is fast changing. What one has to see is whether a class, and not an isolated case into whose hands the newspaper or article falls suffer in their moral outlook or become depraved by reading it or might have impure and lecherous thoughts aroused in their minds. The charge of obscenity must, therefore, be judged from these aspect.
- (7) The section 292 IPC must be amended to add some qualifying prefixes to the word tend to'. The words must be 'grossly' or 'sufficiently' or 'substantially' tend to deprave.
- (8) Indecency be criminalised in the same manner as obscenity.
- (9) It should be ensured that censor boards and preview committees are gender sensitive and equally represented by women and men;
- (10) The terms 'publishes' or 'transmits' in the electronic form should be defined under law of obscenity, so that liability upon the offenders may be fixed.
- (11) Instead of permitting the police to confiscate obscene material without having to first register an offence, a better alternative would be for the "concerned

government departments to expedite action on police reports rather than make policemen judges of pornography”.

(12) There is only one Government recognized forensic laboratory in India at Hyderabad which prepares forensic reports in cybercrime cases. There is need for more such labs to efficiently handle the increasing volume of cybercrime investigation cases. Trained and well-equipped law enforcement personnel at local, state, and global levels can ensure proper collection of evidence, proper investigation, mutual co-operation and prosecution of cyber cases.

(13) The act of accessing obscene material on the computer network should be made a punishable offence.

(14) A strong legislative effort coupled with a wide spread social awareness with morality and ethics is needed to fight this menace so that women are not perceived as a commodity but as individual with right and dignity.

(15) Keeping in mind about the value based Indian tradition and culture, Govt. acts should be properly and strictly implemented.

(16) As the women are more exposed to new 21st century ‘computer age’ exploitation, virtual harassment and cyber violence such as cyber stalking etc, so they should be provided protection against such a ‘modern’ violation of their human rights.

(17) The State may impose restrictions on internet cafes.

(18) The authorities may put curbs on the use of mobile phones in schools and colleges.

(19) There is an urgent need for unification of internet laws to reduce the confusion in their application. For e.g. for publication of harmful contents or such sites, we have Indian Penal Code (IPC), Obscenity Law, Communication Decency law, Self Regulation, Information Technology Act 2000 ,Data Protection Act, Indian Penal Code, Criminal Procedure Code etc but as they deal with the subject vaguely therefore lacks efficient enforceability mechanism. Due to numerous laws dealing with the subject there lays confusion as to their applicability, and none of the law deals with the subject specifically in toto. To end the confusion in applicability of Legislation picking from various laws to tackle the problem, i would suggest unification of law by taking all the internet laws to arrive at Code which is efficient enough to deal with all the problems related to internet crimes.

(20) There's need for a one Cyber legislation which is co-ordinated to look after cyber crimes in all respects. With passage of time and betterment of technology in the present date, has also resulted in numerous number of Information technology related crimes therefore changes are suggested to combat the problem equally fast.

(21) It may be added in the guidelines of Censor Board that the women like as "Sunny Leone" should not be permitted to act in the films and T.V. serials. Further, it is suggested that Women Organisations should also condemn such type of women and oppose against highlighting them in media, so that dignity of women may be saved.

(22) Despite the legislation and development women still need to be made aware of their rights, duties and responsibilities. Journalists have to make people aware of the laws helping them in this goal, through their writings. Legal literacy of women is very important in India if they want to shape their future and get their legitimate in society.

(23) A complete transformation is required in our jurisprudential thought where the agenda of the judiciary, censor boards, media representatives should be to strengthen civil society. If not, the argument continues...and it remains forever as a matter of controversy.

(24) One thing that government can do is make dignity of women as a core aspect of governance in present times so that they can also grow as an individual in natural and independent manner.

(25) Inattentive views of parents or guardians to their descendants particularly in the nucleus family should be controlled and the mentality "*whatever our offspring want, We must give*" should be given up. Side by side, Parents have to realize and observe the sexual consumerism of their children so that their children are not diverted in the wrong way.

(26) The human mind is the combination of both good and evil sides, but interestingly people are by nature sometimes diverted and lost their good ways of lifestyle. In addition, at present, in the era of mechanization people remain very busy for themselves, therefore they remain reluctant to interfere as well as to bring those diverted people in good ways they have lost. So, Common people, who are still on the safe and away from this evil aspect, have to take the responsibilities to bring those diverted people in the right way.

Betrand Russell in one of his famous books says " The government should not teach morality to the public. It is the task of parents. The government should govern."