

Reviewing A Decade of The POSCO Act, 2012

Dr. Rohini Honap¹

Asst. Prof. Vidhya Shetty²

Law Department

Tilak Maharashtra Vidyapeeth, Pune-37

Abstract:

Children are like seeds which demands proper care, attention and love to grow into a responsible citizens. Thus, in modern society it is critical to analyze the rights of children, their safety standards. In addition to having specific rights that take into account their unique needs, children and adolescents also enjoy the same fundamental rights as adults. The Convention on the Rights of the Child, 1989 which India has ratified, acknowledges that it is vital to protect children's welfare and development as well as their inherent human dignity. Therefore the personal integrity and physical safety of a child is within the parameters of fundamental rights of a child. It is the State's responsibility as the primary duty bearer to provide protection that is in the child's best interests. This is precisely what the POSCO Act seeks to protect. The POSCO ACT was enacted in 2012 with the main objective protecting children from sexual offences sexual harassment, pornography and constitution of Special Courts for trial of such offences. This paper seeks to review the effective implementation of the Act since its commencement a decade ago and also to highlight the lacunas and drawbacks in the application of the said Act with a view to recommend necessary changes for optimum achievement of its objectives.

Keywords: Child, protection, Child rights, Sexual harassment, sexual assault, Pornography.

Introduction

There can be no greater inhumanity in the world than marring or ridiculing a child. According to a recent study, India has the highest population of children and adolescents in the world.³ As per the 2011 census, children make up almost 40% of India's population. This sizable population will propel the nation ahead in the ensuing years and decades. As a result, it falls to this generation to make sure that our children are well-educated, healthy, eating a balanced diet, and having a protected childhood.⁴

Various social studies done demonstrate that a child's initial experiences have a substantial impact on their future development. Over the course of their life, what they provide to society depends on how they develop.

Children look up to adults to ensure their safety and care but they often unknowingly fall prey to various forms of exploitation. Poverty, violence, discrimination, conservative community structure, and social prejudices are the primary impediments in their path to justice which makes them the "most innocent and vulnerable casualties of exploitation" India has been witnessing the gross amount of exploitation in terms of child sexual abuse at large, and the conditions are becoming worst day by day. The period of childhood is the foundational period which is ought to be safe, secure, and jovial but for some of the children, the reality of childhood is altogether different.

¹HOD & Principal, TMV's Lokmanya Tilak Law College, Pune. Mob:9822954450, Email address: drrohinihonap@tmv.edu.in

²Assistant Professor, TMV's Lokmanya Tilak Law College, Pune. Mob:9657139751, Email address: vidhya.shetty@tmv.edu.in

³Available at <https://www.unicef.org/india/what-we-do/adolescent-development-participation#:~:text=India%20has%20the%20largest%20adolescent,between%2010%20to%2019%20years> last seen on 08/12/22.

⁴Available at <https://www.indiatimes.com/explainers/news/child-development-in-india-555991.html> last seen on 08/12/2022.

They are facing various challenges from the day they are born and subjected to physical, psychological, emotional, and sexual abuse. Child abuse is a violation of basic child rights that adversely affects the well-being of children.

“Childhood should be carefree, playing in the sun; not living a nightmare in the darkness of the soul.” Dave Pelzer⁵

But in contrast there are some alarming statistics which is a reason to worry and needs to be pointed out.

- According to 2011 census, 33 million children instead of being educated are employed as child labours.⁶
- According to a report of UNICEF in 2014, 1/3rd child marriages happening in the world have Indian child brides.⁷
- According to a report of UNICEF in 2019, 2/3rd child deaths happening in the world is due to malnutrition.⁸
- According to NCRB 2018 Report there has been 500% increase in crimes against children in the period 2008-2018.⁹
- Approximately 23% of women marry before they become 18 years old (National Family Health Survey-5, 2019-2021).¹⁰

Despite the POCSO Act, sexual abuse is still a horrifying reality for many females. Our children are more vulnerable to online abuse since we have already entered the digital age. A challenge to the continuity of education posed by school closures because of restrictions imposed in the wake of the COVID-19 outbreak has been anticipated by almost every household with school-age children.¹¹

An investigation on the scope and type of child abuse in India was conducted by the Ministry of Women and Child Development (MoWCD). More than 50% of the 12,447 youngsters examined for the study reported having experienced sexual assault or abuse. These figures illustrate the importance of the issue. Children who experience abuse make up 77% of the victims of rape or sexual assault.¹²

Another content analysis conducted by The Times of India in 2018–19 revealed that 22% of neighbours, 17% of acquaintances, 14% of domestic helps, 7% of teachers, 7% of one's own close relatives, and 3% of religious leaders are the top offenders of rape and harassment. This demonstrates that the majority of the time, the victim's acquaintances perpetrates the crimes. The majority of incidents happen in the victims' own homes, sometimes even for extended periods of time. Children are frequently ignorant and unsure of what to do, therefore they are unable to speak out about these types of crimes. Many of the case studies that specialists examined revealed that the people close to the rape victims were only discovered after the victims became pregnant.

Such crimes are perpetrated as a result of harassment and stalking that occurs before the incident actually occurs. The attackers are often drug and/or alcohol addicts who harbour resentments toward

⁵ Available at <https://www.haikudeck.com/childhood-should-be-carefree-playing-in-the-sun-not-living-a-nightmare-in-the-darkness-of-the-soul--dave-pelzer-education-presentation-Nli3ORNVZj> last seen on 08/12/22.

⁶ Available at <https://www.cry.org/blog/reality-of-the-practice-of-child-labor-in-india/#:~:text=Nearly%2033%20million%20children%20between,%25%E2%80%94live%20in%20rural%20areas>. Last seen on 09/12/22.

⁷ Available at <https://www.unicef.org/india/what-we-do/end-child-marriage> last seen on 08/12/22.

⁸ Available at <https://www.unicef.org/georgia/press-releases/poor-diets-damaging-childrens-health-worldwide-warns-unicef#:~:text=1%20in%203%20children%20under,two%20live%20on%20poor%20diets&text=NEW%20YORK%2C%2015%20October%202019,on%20children%2C%20food%20and%20nutrition>. Last seen on 08/12/2022.

⁹ Available at <https://ncrb.gov.in/sites/default/files/CII%202020%20Volume%201.pdf> last seen on 09/12/2022.

¹⁰ Available at <https://prsindia.org/billtrack/the-prohibition-of-child-marriage-amendment-bill-2021#:~:text=According%20to%20the%20National%20Family,23%25%20in%20the%20latest%20survey>. Last seen on 09/12/2022.

¹¹ Available at <https://www.indiatimes.com/explainers/news/child-development-in-india-555991.html> last seen on 10/12/2022.

¹² Available at <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6177170/> last seen on 09/12/2022.

the victims. Some do it out of randomness, money, or religious motivations. According to research, girls are more likely than boys to experience sexual assault, rape, and harassment. Many of these victims also had physical and mental impairments, such as blindness, mental anguish, and hearing.

Continuous effort for by National and International Community for Development of Child Rights

Since ages international efforts have been taken to protect children and develop their rights. Right from 1924 till date a number of conventions, protocols, declarations and rules have emphasized on the importance of recognizing and incorporating rights of children through various domestic legislations of member countries. A movement to better protect children was sparked by growing awareness of the inequities in their circumstances and a better understanding of children's developmental requirements.

Some remarkable conventions which the international community has adopted for the protection of children are listed down

1959

In 1959, The United Nations General Assembly adopted the Declaration of the Rights of the Child, recognizing child rights to education, healthy environment and adequate health services to foster their development.¹³

1973

In 1973, International Labor Organization adopted Convention 138, which established the age of 18 as the minimum requirement for employment in any job that could be harmful to a person's health, safety, or morality.¹⁴

1974

The General Assembly in 1974 requested the Member States to uphold the Declaration on the Protection of Women and Children in Emergency and Armed Conflict in light of the vulnerability of women and children in such circumstances. The Declaration affirmed the sanctity of women's and children's rights throughout armed conflict and forbids attacking or imprisoning civilian women and children.¹⁵

1979

The United Nations General Assembly proclaimed 1979 as the International Year of the Child, with UNICEF taking the lead. This was done to commemorate the twentieth anniversary of the 1959 Declaration of the Rights of the Child.

1989

Adopted by the UN General Assembly, the Convention on the Rights of the Child is widely hailed as a major victory for human rights, which recognised the importance of children as social, economic, political, civil, and cultural actors. The Convention guarantees and establishes minimum requirements for safeguarding children's rights in all respects. The Convention depicts the child as a distinctive person and a part of a family and community, with duties and rights that are in line with his or her developmental stage and age. The Convention firmly places the emphasis on the well being of the child by recognising the rights of children. The Convention acknowledges that it is vital to protect children's welfare and development as well as their inherent human dignity. It makes it clear that all children should have the right to a basic standard of living. Children must rely on adults to provide them with the care and direction they need to develop into independent adults. It is the State's responsibility as the primary law makers to formulate policies and enact laws that are in the child's

¹³Available at <https://www.un.org/en/global-issues/children#:~:text=In%201959%2C%20the%20UN%20General,%2C%20shelter%2C%20and%20good%20nutrition.La> st seen on 01/12/2022.

¹⁴Available at [https://www.humanium.org/en/minimum-age-convention/#:~:text=The%20International%20Labour%20Organization%20\(ILO,working%20age%20at%2015%20years.La](https://www.humanium.org/en/minimum-age-convention/#:~:text=The%20International%20Labour%20Organization%20(ILO,working%20age%20at%2015%20years.La) st seen on 01/12/2022.

¹⁵Available at https://www.un.org/en/genocideprevention/documents/atrocities-crimes/Doc.19_declaration%20protection%20women%20armed%20conflict.pdf last seen on 01/12/2022.

best interests. The future of all societal members is harmed by short-sighted policymaking that ignores the needs of children. India has ratified to this convention¹⁶

2006

The United Nations Office on Drugs and Crime and UNICEF jointly published the Manual for the Measurement of Juvenile Justice Indicators. The Manual gives governments the ability to evaluate the state of their juvenile justice systems and implement any required adjustments.

Indian Effort towards Child Protection

Sections 375, 354 and 377 of the Indian Penal Code, 1860 defines child sexual abuse as an offence, but the modesty and protection from sexual abuse of male children are not covered under the Code. Additionally, the Code does not define phrases like "modesty" and "unnatural offence."

The Goa's Children's Act, 2003 and Rules, 2004 was as such the only piece of law in India prior to the implementation of the POCSO Act, 2012, that sought to safeguard a child's rights.

It was crucial to enact a statute that specifically addresses the issue of rising child sexual abuse cases in the nation because there was no relevant legislation in place at the time. The Protection of Children from Sexual Offences Act, 2012 (POCSO) was implemented on November 14, 2012, thanks to the work of numerous NGOs, activists, and the Ministry of Women and Child Development.

The POCSO Act was passed in support of the Convention on the Rights of the Child ratification in order to protect children's physical health and safety. Its goal is to provide a strong legal framework for the defence of children against crimes involving sexual assault, sexual harassment, and pornography while upholding their best interests throughout the entire legal process.

POCSO includes different sexual activities like fondling, engaging a child to touch or be touched sexually, intercourse, exhibitionism, involving a child in prostitution or pornography, or online child ensnaring by cyber-predators.

It outlines the process for putting the laws into effect and includes rules for protecting children from sexual assault and pornography. Instances of child sexual assault occur in schools, places of worship, parks, hostels, etc, and child safety is never been guaranteed at any such places. It was important to pass separate legislation to establish a solid framework for reducing the frequency of such offences and punishing those who commit them in light of these rising hazards.

The Calcutta High Court reaffirmed the law formed under Section 23 of POSCO and ruled that anyone, including a police officer, shall be prosecuted if they commit such a breach in the landmark case of *Bijoy @ Guddu Das v. The State of West Bengal, 2017*.¹⁷

A striking aspect of the POCSO Act, 2012 is that it makes no distinctions based on the gender of the victim or the perpetrators. This fixes one of the clauses of the Indian Penal Code's main flaws. Anyone younger than 18 years old is included in the definition of a child, and in some instances, women have even been found guilty of child sexual assault by the courts.

In the cases involving child sexual abuse, the last seen theory is used. In accordance with this hypothesis, when there is a very small amount of time between when someone was last seen alive and when they were last seen with the victim, it is assumed that they are the ones who committed the crime.

This law recognises both touch-based and non-touch forms of sexual harassment of children, including stalking, forcing a child to expose themselves or exposing oneself to a child, among other forms according to Sections 11 and 12. Sections 13, 14, and 15 of the POCSO Act particularly stipulate harsh penalties for exposing children to, or employing them to produce, child sexual abuse material (CSAM, often known as child pornography).

According to Section 13 of the POCSO Act, anyone who uses a child for pornographic purposes—by, for example, showing the child's sexual organs, using the child in real or simulated sexual acts, or showing the child indecently or obscenely in television or internet programmes or advertisements—commits an offence under this section and is subject to the penalties set forth in Sections 14 and 15 of

¹⁶ Available at <https://www.unicef.org/child-rights-convention/convention-text> last seen on 01/12/2022.

¹⁷ 2 Cal LJ 224

the POCSO Act. In the case of *Fatima A.S v. State of Kerala ,2020*¹⁸, a mother claimed that the purpose of a social media video in which she was painted naked above the navel by her two young children was to teach them sex education. In this decision, the Supreme Court of India noted that "what the child learns from their mother would always have a lasting imprint on their mind in the early years. The mother is typically quoted as being the child's "window to the world." The same was therefore covered by Section 13 of POCSO.

Despite the fact that POCSO does not specifically recognise grooming, experts claim that section 11 of the Act can be read to do so. Section 67(b) of the Information Technology Act criminalises grooming, which involves developing and maintaining a connection with a minor in person or online in order to facilitate either online or offline sexual contact with the child.

Child friendly practices under POCSO

The POCSO Act also established protocols to make the criminal justice system child friendly and avoid re-traumatization. This covers everything, from the proper way to record the child's statement to the medical exam to the designation of specific child-friendly courts. This has been covered in the POCSO Act in sections 24,26 and 33. A child is entitled to the following under the terms of the POCSO Act: have their statement recorded at their home or a location of their choice, and ideally by a female police officer or a member of the force who is at least a sub-inspector level. The police officer is responsible for making sure the child doesn't interact with the suspect while the case is being investigated. Unless a Special Court orders otherwise, the child cannot be held overnight at the police station, and his or her identity should be kept private from the general public and the media.

If the victim is a girl, a female doctor should perform the examination, and the examination can only be performed in the presence of a parent or any other person the victim trusts. If neither of the two are present, the examination must be conducted in front of a woman chosen by the head of the medical institution

The POCSO Act lays down that the special courts must also be child friendly. A few of the provisions include making the court a child-friendly environment by allowing a family member, guardian, friend, or relative the child has confidence in to be present; providing frequent breaks for the child throughout the trial; and making sure the child is shielded from the accused during gathering evidence and cross-examining. Proceedings may also take place behind closed doors, in the company of the child's parents or another trusted adult, and without the knowledge of anybody not directly involved in the case.

Additionally, there are standards for interrogating the survivor, including special needs and disabled children, and provisions if the case calls for assistance from NGOs or social workers as well as professionals (psychologists, interpreters, etc.) throughout the pre-trial and trial stages for the child.

The Supreme Court stated in the case of *State of Gujarat v. Anirudhsing and Others, 1997*¹⁹ that it is every citizen's responsibility to assist and cooperate with the investigating authorities and provide information regarding the commission of crimes that are punishable by law. In a number of situations, schools and teachers assist the young victims of sexual abuse by notifying the appropriate authorities.

In the significant case of *Shankar Kisanrao Khade v. State of Maharashtra, 2013*²⁰ the Supreme Court established rules for reporting the crime. An 11-year-old boy with a moderate intellectual handicap was raped in this case, but neither the police nor the juvenile justice board received a complaint of the crime. The Court noted that children with intellectual disabilities are more likely to encounter sexual abuse, as such the institutions that shelter such children have a duty to report such crimes. Furthermore, it was established that failing to report a crime in compliance with the POCSO Act's provisions constitutes a serious offence.

¹⁸ 4 KLT 617

¹⁹ (1997) 6 SCC 514

²⁰ (2008) 15 SCC 269

POCSO Amendment, Act 2019²¹

In order to better protect children from sexual assault and harassment, the POCSO Act was amended in 2019 to increase the severity of the penalties for sexual offences against children which includes the following.

The law neutralises gender in crimes against minors.

The use of hormones or other chemicals on youngsters to induce early sexual maturity in preparation for penetrative sexual assault is now included in the definition of "sexual assault."

The Act defines child pornography as any visual representation of child sexual activity, including pictures, videos, digital images, or computer-generated representations that are indistinguishable from real children.

The amendment also proposes harmonising it with the IT Act and penalising the transmission of pornographic content to youngsters. By including a potential for the death penalty, the Act strengthens the penalties for sexual offences against children. One of the most crucial aspects is that individuals who commit penetrating sexual attacks on children under the age of 16 will be penalised with fines and sentences ranging from 20 years to life. The act increases the minimum punishment for serious penetrative sexual assault from 10 to 20 years, and it also increases the maximum punishment to the death penalty.

The Act stipulates that anyone who utilise a child for pornographic purposes should be punished with up to five years in prison and a fine in order to stop child pornography. However, the sentence would be up to seven years in prison and a fine in the event of a second or subsequent conviction.

Additionally, the government has authorised over a thousand fast-track courts to expeditiously adjudicate cases under POCSO.

Lacunae of POCSO Act of 2012

The process and application of the laws listed under the POCSO Act have some short comings which are listed below:

- **Privacy and dignity are violated by the two-finger test:** When doing a medical examination on sexual assault victims, the two-finger test is applied. It is assumed that the victim has experienced recurrent sexual contact if her vagina can accommodate the free movement of two fingers. The minor females who are the targets of any violation of the POCSO Act are subjected to this test. Although this test was outlawed by the government in 2012, it is still used. In the 2013 case *Lillu @ Rajesh and others v. State of Haryana, 2013*²² it was determined that two-finger tests are unconstitutional because they violate a woman's right to privacy, dignity, and mental integrity.
- **Outdated investigation machinery or equipment:** The investigation machinery or equipment in cases of child sexual abuse is not properly versed in the technique, which results in a flawed investigation. For instance, the High Court of Bombay acquitted the alleged offender in the case of the Additional Sessions Judge, *Hoingoli and Ors. v. Bhawat and Ors. 2017*²³ because the victim's frock, which was in the custody of the police, had been opened and the semen stains on it could not have been used as evidence to support the conviction.
- **Inappropriate use of last seen theory:** The last seen theory cannot be utilised without circumstantial evidence since it has the potential to result in erroneous conviction in a number of situations. The Supreme Court determined that the last seen notion is a tenuous piece of evidence and cannot be relied upon solely in the case of *Anjan Kumar Sarma v. State of Assam, 2017*²⁴.

²¹Available at

<https://wcd.nic.in/sites/default/files/Protection%20of%20Children%20From%20Sexual%20Offences%20%28Amendmen%29%20Act%2C%202019.pdf> last seen on 02/12/2022.

²²2013 (2) ACR 1832, AIR 2013 SC 17.

²³Available at <https://www.lawyerservices.in/The-Addl-Sessions-Judge-Hingoli-and-Others-Versus-Bhagwat-and-Others-2018-01-11> last seen on 05/12/2022.

²⁴(2017) 14 SCC 359

- **High rate of acquittals:** The number of acquittals are high due to faulty investigation process. Despite the fact that Section 35(2) of the POCSO Act states that "the Special Court shall complete the trial, as far as practicable, within a period of one year from the date of taking cognizance of the offence," the growing number of unresolved cases is making it extremely difficult for the justice system to function effectively.
- **Silent on sexual acts that occur with consent:** If there is sexual activity with consent, and one of the participants is a minor, the POCSO Act may be used to bring charges against the adult partner because the youngster's permission is not taken into consideration by this Act.
- **Children's false complaints are not sanctioned:** A false complaint made with the intent to humiliate, extort, intimidate, or defame another person is punishable under Section 22 of the POCSO Act. A youngster is, however, excluded from receiving such a punishment, which is a flaw because many adults abuse this exception.

The NCRB reports that overall, 1,49,404 incidences of crime against minors were reported in 2021 compared to 1,28,531 occurrences in 2020, an increase of 16.2%. According to NCRB statistics, the POCSO Act was used to report every third crime against a child. 33,348 incidences including penetrative sexual assault and aggravated penetrative sexual assault were reported under Sections 4 and 6 of the POCSO Act in 2021; of these, 33,036 involved females and 312 involved boys.²⁵

In spite of this enactment having lofty and noble objectives child sexual abuse is escalating and the statistics reflect In India, only 3 % of Child Sexual Abuse related offenses were reported to the police.²⁶

The latest report released by the National Crime Records Bureau (NCRB) shows that 1,49,404 cases of crime against children were registered in 2021 of which 53,874 - 36.05 % were under the Protection of Children from Sexual Offences Act (POCSO). There were 47,221 POCSO cases out of 1,28,531 cases of crime against children in 2020 (36.73 per cent) and 47,335 of 1,48,185 such cases in 2019 (31.94 per cent).²⁷

Suggestions

- In India, child abuse is still rife, and the current laws and rights are insufficient to protect the best interests of the child. Since the majority of the victims are youngsters, a sizable amount of child abuse goes unreported. However, even documented incidences of abuse are not punished because there are no explicit provisions in the Indian Penal Code. For instance, there are no particular legal measures addressing sexual exploitation of young males. Having said that, there are some recommendations that the system may put into place in order to guarantee a better future for the children's safety.
- Different Strategy having a mixed effort: Several different sectors can be involved to ensure a mixed approach, notwithstanding the government's efforts to prevent crime against children. The government will benefit greatly from the involvement of NGOs and other organisations such as stakeholder groups and anti-human trafficking units in developing the response mechanism to these crimes. NGOs promoting rural development should concentrate on these impoverished households that are arbitrarily required to send their kids out to work. It's crucial, though, that this regulation is not abused to shift accountability from one sector to

²⁵ Available at <https://www.childlineindia.org/a/issues/sexual-abuse> last seen on 10/12/2022.

²⁶ Available at <https://indianexpress.com/article/india/crime-against-kids-a-third-still-under-pocso-8119689/> last seen on 10/12/2022.

²⁷ Available at <https://thewire.in/government/tackle-rising-cases-child-sex-abuse-ncrb-gaps-pocso-data> last seen on 10/12/2022.

another. NGOs and other organisations can complement government initiatives rather than taking their place.

- Public sensitivity and awareness need to be increased regarding the issues that we face in our profession. It is necessary to focus more on prevention rather than just rehabilitation in order to solve the problem of child prostitution. There are impoverished towns and villages that serve as the bases for trafficking. All sorts of abuse, aggression, and exploitation must be explained to the children; doing so will help them gain the confidence to report incidents to their family or the appropriate authorities.
- The legal repercussions for criminals in the event that they commit such crimes must also be made clear to the children; these delicate subjects can be discussed in the form of documentaries and other participatory modes of approach, such as plays. But not only youngsters need to be educated; the general public as a whole must also be made aware of this, which calls for effective media campaigns and advertising.
- Strengthening of POSCO Act, 2012: Although the Protection of Children from Sexual Offences Act was passed in 2012, it has not been fully implemented, including the creation of special courts in each district to facilitate prompt trial processing. All parties involved, including law enforcement, judicial, and medical authorities, should get regular training on how to respond in circumstances involving children and their families during investigations and prosecution. The POSCO Act mentions significant directives, such as the police should not interact with children while wearing a uniform, and they should not be invited to the police station to register a complaint or report harassment. However, it is unclear how effectively these directives are being implemented.
- Children are sometimes referred to be a nation's future. The future standing of the nation is in peril if there is a persistent aggravation in children's development. In India, the exploitation of children's rights is widespread, and frequently, those who violate the law are unaware that they are doing so. We must make sure that the severity of the penalties changes in order to combat this.

Conclusion

The year 2012 saw the introduction of the POCSO Act, which aimed to prevent and address child sexual abuse. However, the law could not be successfully implemented to accomplish its goals without the committed and coordinated efforts of the implementing authorities. A comprehensive strategy is required in this regard, and it is the duty of state governments, police forces, legal systems, and medical professions to uphold the letter and spirit of the law and respond to these circumstances with urgency, understanding, and profound concern for the physical and mental integrity of the child.

Since numerous training and awareness programmes have raised awareness, there have been increase in the number of reported occurrences as compared to the previous years. In such a circumstance, it is essential to move the investigation and legal proceedings along rapidly to improve the likelihood of conviction and protect the survivor's reputation.

References

1. <https://www.unicef.org/india/what-we-do/adolescent-development-eparticipation#:~:text=India%20has%20the%20largest%20adolescent,between%2010%20to%2019%20years>
2. <https://www.indiatimes.com/explainers/news/child-development-in-india-555991.html>
3. <https://www.haikudeck.com/childhood-should-be-carefree-playing-in-the-sun-not-living-a-nightmare-in-the-darkness-of-the-soul--dave-pelzer-education-presentation-NIi3ORNvZj>
4. <https://www.cry.org/blog/reality-of-the-practice-of-child-labor-in-india/#:~:text=Nearly%2033%20million%20children%20between,%25%E2%80%94live%20in%20rural%20areas.>

5. <https://www.unicef.org/india/what-we-do/end-child-marriage> last seen on 08/12/22.
6. <https://www.unicef.org/georgia/press-releases/poor-diets-damaging-childrens-health-worldwide-warns-unicef#:~:text=1%20in%203%20children%20under,two%20live%20on%20poor%20diets&text=NEW%20YORK%2C%2015%20October%202019,on%20children%2C%20food%20and%20nutritionhttps://ncrb.gov.in/sites/default/files/CII%202020%20Volume%201.pdf>
7. <https://prsindia.org/billtrack/the-prohibition-of-child-marriage-amendment-bill-2021#:~:text=According%20to%20the%20National%20Family,23%25%20in%20the%20late st%20survey.>
8. <https://www.indiatimes.com/explainers/news/child-development-in-india-555991.html>.
9. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6177170/>
10. <https://www.un.org/en/global-issues/children#:~:text=In%201959%2C%20the%20UN%20General,%2C%20shelter%2C%20and%20good%20nutrition.>
11. [https://www.humanium.org/en/minimum-age-convention/#:~:text=The%20International%20Labour%20Organization%20\(ILO,working%20age%20at%2015%20years.](https://www.humanium.org/en/minimum-age-convention/#:~:text=The%20International%20Labour%20Organization%20(ILO,working%20age%20at%2015%20years.)
12. https://www.un.org/en/genocideprevention/documents/atrocities-crimes/Doc.19_declaration%20protection%20women%20armed%20conflict.pdf
13. <https://www.unicef.org/child-rights-convention/convention-text>
14. <https://wcd.nic.in/sites/default/files/Protection%20of%20Children%20From%20Sexual%20Offences%20%28Amendment%29%20Act%2C%202019.pdf>
15. ¹<https://www.lawyerservices.in/The-Addl-Sessions-Judge-Hingoli-and-Others-Versus-Bhagwat-and-Others-2018-01-11>
16. <https://www.childlineindia.org/a/issues/sexual-abuse>
<https://indianexpress.com/article/india/crime-against-kids-a-third-still-under-pocso-8119689/><https://thewire.in/government/tackle-rising-cases-child-sex-abuse-ncrb-gaps-pocso-data>
17. Tilak, G. (2020). The study and importance of media ethics.
18. Tilak, G. (2019). Freedom of Expression in the Digital Age.