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# **CYBER DEFAMATION IN INDIA: IT'S GROWTH AND IT'S EFFECTS**

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## **Abstract**

*Technology is evolving at an extreme rate and it has led to a great development in the networking of computers*

- i. e, Cyberspace. The development in Cyberspace or Internet and it been easily accessible has been a major factor in committing of criminal activities through internet. The committing of crime through or by using internet is called Cybercrime. Cyber crime like global warming is a problem which the entire world is facing. Cybercrime is of various types ranging from hacking to cyber terrorism and many more other crimes. One of the most prevalent type of cybercrime is Cyber Defamation. Whenever some person's or some entity's reputation is harmed by the use of internet it amounts to cyber defamation. Cyber defamation results in damage of the image of a person or entity and also in harassment of that person or entity. Cyber defamation is a serious threat for our country.*

## **Introduction**

In India the Internet service was started by Videsh Sanchar Nigam Limited on 15<sup>th</sup> August 1995 and it was accessible to very few people and with the development of the technology it became easier to access and a decent amount of people started to access it. But the real growth of Internet took place on September 5, 2016 when Reliance group launched Jio and started to provide internet for free on every new mobile phone purchased. This thing not only increased the usage of internet but also its reach within the hands of ordinary people. However, this wave of free internet created by Jio produced an effect which is and will be affecting India in long run. After Jio other telecom players also started to provide 4G internet. Now in current scenario people can get to use internet for a month after paying a small amount which is to be paid as a recharge fee every month. [i, ii]

The effect created by this increase of internet usage was the increase in cybercrimes in India. This type of crime which was only affecting a limited number of people was now reaching to every section of society as the people took the bait of unlimited internet. There was a surge in the happening of cybercrime cases in India. One the cybercrimes which is exponentially growing is Cyber Defamation. Defamation in layman's language stands for false statements published or spoken against a person which is going to harm his reputation in the eyes of right thinking members of the society. Defamation is of two types mainly

- 1) Slander – It means publication of a defamatory statement in a non-permanent form . For example, words which may be spoken but not written.
- 2) Libel – It stands for publication of defamatory statement against someone in the written formator permanent format i.e, printing or writing etc..

Keeping the meaning of defamation as the core Cyber Defamation can be understood as “an act of insulting, offending or defaming a person by publishing or sharing or posting or liking or re-tweeting any false statements about him.” We can share anything defamatory about any person over the internet and it will go from reach of one person to millions of people within a matter of seconds. Twitter can be taken as a prime example where cyber defamation is committed every minute as it is a platform which provides for its users to post comments regarding anyone and people without realizing what they are posting can not only harm the reputation of that person to a large extent but it can also have severe consequences for the persons posting these comments. Example can be taken of the defamation and harassment of child Actress Riva Arora over social media platforms where a large number of users are commenting and putting baseless allegations like how she is using steroids to look more mature than her actual age . This all started to happen after Riva Arora appeared on a Music video with singer Mika Singh . The comments did not stop here only it went to even sexual comments being posted against her . There are multiple cases like this which are happening everyday on these platforms or cyberspace which are requiring stern measures to be taken for dealing with them. [iii]

### **Cyber Defamation And It's Growth**

Defamation which is both a civil and criminal wrong is punishable under section 499 & 500 of Indian Penal Code, 1860 which provides a punishment for simple imprisonment for a term which may extend to a imprisonment for two years with or without the fine. This also covers within its

ambit Cyber Defamation. There is also Information Technology Act, 2000 and Information Technology (Intermediary Guidelines) Rules, 2011 for dealing with Cyber Crimes like hacking, phishing, cyber defamation etc.. However even after having these provisions there is still regular growth in cybercrimes being committed.

According to a report by the Pune Cyber Police “there has been an increase of a little over 100 percent in the defamation and fraud cases on social media platforms from 2,174 in 2020 to 4,357 in 2021.” Also it was told by Pune Cyber Police that creating fake profiles, posting and sharing defamatory and vulgar contents, anti-religious comments are quite common on social media platforms. [iv]

The cases of cyber defamation are not only committed only against normal citizens but they are especially committed against people who hold fame for example actors, cricketers, social media influencers etc.

Recently there was a FIR lodged against at least six social media accounts which were operating on Twitter and were making lewd comments against minor daughters of cricketers Virat Kohli and M. S. Dhoni. [v]

There are three conditions which are essential for constituting the wrong of Cyber defamation:-

1. The defamatory material must be published on a platform in the internet.
2. The defamatory material published must be in such a form that it can be easily noticed.
3. This defamatory material should be published or posted in the cyberspace with the intention to harm a person's reputation or with the knowledge that the material posted in the cyberspace can harm that person's image or reputation.

After these three conditions are fulfilled the person who posted this defamatory material can be held liable for cyber defamation.[vi]

## **Provisions for dealing with Cyber Defamation**

Following provisions have been provided by the legislature for dealing with the cyber defamation cases :-

### **1. Section 499 of Indian Penal Code, 1860**

According to this section whenever a person with the intention of harming another person's reputation or knowing that whatever imputation he is making against that person, by words either spoken or intended to be read, or by signs or by visible representations, will harm, the reputation of such person is said to defame that person.

After the enactment in Information Technology Act, 2000 the definition of Defamation under section 499 of IPC now also included within its ambit "speeches" and "documents" in electronic form.

### **2. Section 469 of Indian Penal Code, 1860**

This section says that whenever a person commits forgery, with the intention that the document or electronic record forged shall harm the reputation of any party or with the knowledge that such forgery is likely to be used for the purpose of harming the reputation of any party, shall be given a punishment of imprisonment of either description for a term which may extend to three years and shall also be liable to fine.

### **3. Section 503 of Indian Penal Code, 1860**

It means when one person threatens another person by giving threat of causing any injury to his person, reputation or property, or to the person, reputation or property of any one in whom that person is interested, with the intention to cause that person to do something which he is not legally bound to do, or to omit something which he was legally bound to do, as the means of avoiding to do the execution of such threats by himself, commits the offence of criminal intimidation.

### **4. Section 66A of Information Technology Act, 2000**

Whoever through the use of any communication device or through the use of any computer resources:-

- Disseminates any information which has a menacing character or is grossly offensive; or
- By persistently making use of such computer resources or devices of communication for

dissemination of information which he already knows is false but still performs such dissemination of false information just for the purpose of causing insult, injury, annoyance, criminal intimidation, enmity, hatred, danger etc..

- Sends any e-mail or electronic mail message only with the purpose of causing annoyance or to mislead any recipient about the origin of the message.

If someone commits any of the above that person shall be punished with imprisonment for a term which may extend to 3 years and with fine.

However this section 66A brought down or repealed after **Shreya Singhal's Case**<sup>[viii]</sup> in which it was decided that the provisions of this section does not fall under the exceptions of Article 19(1)(a)

- ii. e, freedom of speech and expression which are given under Article 19(2). This was done because this section does not defined what kind of information would be offensive and would cause annoyance or injury so because of this there was vagueness because of which this section was being used arbitrarily and so it was violative of Article 19(1) (a) of Indian Constitution. <sup>1</sup>

### **5. Section 79 of Information Technology Act, 2000**

This section deals with the obligations or liabilities of the Internet Service Providers (ISPs) and the Internet Intermediaries in India.

This section states that it is not the liability of the ISPs if there is any third party information or data or communication link made available by them so long as –

1. The function performed by them is limited only to the providing of access to communication system;
2. They do not :-
  - Start the transmission
  - Choose who will be the receiver of the transmission
  - Choose or modify the information involved in the transmission
3. Due diligence is being exercised by them in their duties and they are adhering to any guidelines which may be prescribed.

However ISPs can still be held responsible in following situations –

1. If in any unlawful acts they have conspired, abetted or induced
2. If after receiving information from an appropriate government agency regarding any information, data, communication link being used to commit unlawful acts without interfering with evidence and they fail to remove or disable access any such data, communication link, information.

In the case of **Swami Ramdev v. Facebook**[<sup>viii</sup>] following directions regarding ISPs and intermediaries were issued which are as follows –

- Any URL/Links to any defamatory material which are uploaded from outside India the Intermediaries like google & Facebook are directed to remove access and disable them from being in Indian territory and to ensure that Indian users are unable to access them.
- The defamed person on discovering any further URL/Link containing defamatory material shall inform that platform or intermediaries which shall take down that information globally or only in Indian domain depending from where the content has been uploaded.
- If platforms after receiving the information about defamatory material are of opinion that such material is not defamatory or offensive then they shall inform that to the person who complained about this and then he would seek remedies in accordance with law.

#### **6. Section 65A and 65B of Indian Evidence Act**

These sections state about what forms of defamatory materials are admissible as evidence by courts in India.

Following points state regarding what are those materials which are admissible as evidence-

- Any electronic record which is printed on paper or recorded or Copied in a magnetic or optical media shall be treated as a document and shall be admissible in court of law.
- Online chats are also admissible as evidence.
- Electronic mails as evidence are also admissible in court of law.

## Famous Cases of Cyber Defamation

1. **Bois Locker Room case**– This is a very famous case in which teens in Delhi created a group on Instagram and started sharing obscene and morphed photos of minor girls. In this group the participants used to pass on lewd comments on the girls and the conversation in this group even went up to discussing how they will rape the girls whom photos they were sharing. But the screenshots of these conversations were reported to the police and after this Delhi Commission for Women and Delhi Police took swift actions and made arrests.  
[ix]
2. **SMC Pneumatics India Pvt. Ltd v. Jogesh Kwatra**[ x ] – This was the first cyber defamation case filed in India. This case was all about the defendant employee who was sending defamatory or offensive e-mails to the plaintiff's company fellow employers and also these offensive e-mails were sent to various subsidiaries of the plaintiff's company all over the world in order to tarnish the company's reputation. The plaintiff then filed a suit demanding a permanent injunction for restraining of posting of such defamatory remarks by the defendant. The Delhi High Court after observing that after the submissions of the parties a prima facie case was made out by the plaintiff it passed an order restraining the defendant from defaming the plaintiff both in physical world and also in the internet.
3. **Kalandi Charan Lenka v. State of Odisha**[xi]– In this case the victim started to receive vulgar and obscene messages on her mobile phone and also these messages about victim were sent to victim's family and friends. After this in 2015-2016 victim started to receive letters which contained vulgar and abusive language and these letters contained fake information which was only meant for damaging the reputation of the victim. Finally a fake Facebook account of the victim was made through which the morphed naked photos of the victim were shared with the purpose of outraging her modesty. After this Victim filed a complaint to police in writing. Investigations were conducted and the culprit was found. A suit was filed which went on to High Court of Odisha which held the culprit liable for cyber defamation of the victim through use of fake accounts, obscene images and texts. However the culprit was still given the permission to be released on bail after imposing strict conditions.
4. **M/s Spentex Industries Ltd. & Anr. v. Pulak Chowdhary**[xii] – This case was filed by the petitioner with a demand for permanent and prohibitory injunction along with ₹50,00,000 as compensation for loss caused to the petitioner firm's reputation and business because of the defamatory and offensive e-mails sent by the respondent to International

Financial Corporation, World Bank, UZREPORT, President of Uzbekistan. It was decided in this case only ₹5, 00,00 would be given to the plaintiff and the respondent was ordered to refrain from making any false or misleading statements either in written or oral format.

- 5. Dow Jones & Co Inc. v. Gutnick<sup>[xiii]</sup>** - In this case the an Australian Businessman brought a suit for libel against the Appellant for an article published by Appellant in a weekly financial magazine called Barron's. In which it was alleged that the businessman was the biggest customer of a convicted money launderer . The same article was also published in the website of the Appellant. The businessman brought the suit for damages in the court at Victoria. The Appellant argued that the suit should be dealt at New Jersey from where the article was uploaded in the website. It was held that the publication of the information takes in internet takes place at the place where it is downloaded and it was also decided that Businessman claiming for compensation for the damage to his reputation in Victoria only then the Court of Victoria cannot be said to inappropriate forum for this.

### **Causes for the spread of Cyber Defamation**

There are a large number of reasons which are causing increase in cyber defamation across India and the entire world. Some major reasons are mentioned as follows –

- 1. Trolling** – Trolling is the display of disruptive online behaviour which is visible when someone posts malicious content With the intention of causing some altercation or disturbance or for upsetting someone. Trolling is rising day by day in the Indian subcontinent as people who are using the Internet especially the social media are generally ignorant about the repercussions they would be facing if someone complaint against them. In India trolling is also rising exponentially because the people are generally not aware about the laws prevailing in the country and also they need proper education about to behave online. <sup>[xiv]</sup>
- 2. Rise of Roasting Culture** – Roasting means an event where the participants makes sarcasms against each other. But in India roasting has taken a new turn people on various platforms are using abusive language for telling their opinion about something or someone so that they can garner more views and likes to earn fame. Example can be taken of YouTube from where the roasting culture has began. YouTube from time to time in India has even removed famous account from its platform.
- 3. Increasing the count of viewership** – cyber defamation causes disturbance in the internet

for a time. However if the issue of cyber defamation of the person turns out be controversial or is gaining a large number of views from the internet users then the intermediaries does not even consider to do something about it as that following issues as if something done regarding in it that following intermediaries would be loosing some profit.

4. **Problem of Identification** - Fake accounts on social media are everywhere and they are the most common means of spreading abusive, offensive, defamatory content regarding someone. In the Case of Bois Locker room the main accused who was a girl was caught after months of investigation. She was using a fake account with the name "Siddharth" for instigating other group members for committing criminal activities. This fake account culture has caused a lot of confusion all around the globe as it makes quite difficult for the police to identify the culprit. [xv]
5. **Location issue** – It means that any person from any corner of the world can defame another person within a matter of seconds. However in many cases it is discovered that the person whose against whom the action has been taken is not even the citizen of our country because of which the courts does not have any jurisdiction to deal with them. This thing is known to many people so they are taking advantage of this and are defaming other persons without any fear of law.

### **Means of Combating Cyber defamation**

Some of the means of dealing with or reducing cyber defamation are mentioned here as follows—

1. **Awareness** – It means the persons who are using the internet should be given education about what should be their behaviour in an online platform like Facebook, twitter etc.. They should be taught about the consequences they may face for defaming someone and also there should be stern measures taken against someone who uses abusive language over social media platforms so that it might be set as an example for other users to think regarding how should they behave.
2. **Stricter punishments** – The persons who are committing cyber defamation or any other cyber crime should be dealt with strictly and with a little harsh punishments so that people starts to refrain from using abusive language against any person over the cyber space.
3. **Stricter guidelines** – Social media platforms like Facebook and twitter should be given order by the government for regularly Identifying fake accounts and those users which

using lewd, offensive or abusive languages on these platforms against other users of these platforms. After identifying these fake accounts these accounts shall be reported to the cyber police immediately and these accounts should be blocked or frozen by the platform with an immediate effect. We can take here example of laws for cyber defamation in US where the laws are quite stringent and their enforcement and execution is also very quick.

4. **CERT-IN** – It stands for Indian Computer Emergency Response Team. It is designated by Information Technology Act, 2000 as a national Nodal agency for dealing with the disturbances and other related matters taking place in relation with threats to computer security.
5. **Cyber Crime Investigation Cell** – Currently these cells are opened in Mumbai, Hyderabad, Delhi, Chandigarh, Madhya Pradesh, Lucknow, Pune, Bangalore etc.. These cells are part of Crime Investigation Department (CID). These cells can be contacted for help through written complaint to Head of the Cyber Crime Cell of that city. If there is no Cyber Crime Cell in a city than in that case a FIR can be filed at a local Police Station for reporting of the cyber crime.

### **Conclusion & Recommendation**

In India development of cyberspace is taking place at an exponential rate and because of this people around the country are able to connect and communicate with each other very easily and quickly. People now can also voice their opinions and views in front of the world through the help of internet. But there has been a tussle between freedom of speech and expression and a person's right to reputation. This tussle has caused vagueness in laws which is seen in various cases especially in Shreya Singhal's case where section 66A of Information Technology Act was struck down because it was against Article 19(1)(a) of the Constitution and was also having a vague meaning. With the development of social media and the controversy culture there has been an increase in the responsibility of Internet service Providers (ISPs) and the intermediaries but instead of focusing on their responsibilities they are more interested in the profits they reap from the controversies and conflicts over the cyberspace like in case of Swami Ramdev v. Facebook or Boies Locker Room case etc.. There are various means through which cyber defamation and other forms of crimes like through posting defamatory comments or sharing morphed photos or using vulgar language etc... But there are also various ways and various provisions which are made or are being devised for combating these cyber crimes.

However cyberspace is a very unpredictable place where there are plenty of ways to commit crimes so because of this there is a need for establishing a separate department for dealing with the crimes related to social media. Also there is a need for bringing specific changes with time within the laws related to cyber space and also for legislation of a separate law or provision dedicated towards dealing with cyber defamation.

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