



PROSTASIA
FOUNDATION

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Shri Hitesh C. Awasthy (IPS)
Director General of Police
Uttar Pradesh

By email: dgp@nic.in, digcomplaint-up@nic.in, dgpcontrol-up@nic.in

March 23, 2021

Dear Sir,

Humari Suraksha programme

Prostasia Foundation is a child protection organization that works on the prevention of child sexual abuse using a human-rights centered approach. Although based in the United States, we have worked with Indian organizations such as Aarambh India Initiative, Don't Offend India, and the Internet Freedom Foundation (IFF).

We have taken note of recent media reports about the Humari Suraksha programme launched by the UP Police Women Power Line, which according to initial reports (such as India Today, February 13) would involve displaying pop-up messages to visitors of pornography websites. However later clarifying reports (such as Times of India, February 17) note that only websites hosting child sexual abuse material (CSAM) would be targeted.

We would be grateful if you could address several aspects of this programme that we find puzzling and disturbing.

First, we note that there is a clear distinction, both legally and ethically, between adult websites that host consensually produced pornographic content, and criminal enterprises that host child sexual abuse material (CSAM). As such, it would be inappropriate to present users who are accessing websites in the former category with pop-up messages that falsely suggest that they are tolerant of CSAM or are at risk of committing violence against women or children.

On the other hand when a website is identified that is devoted to hosting CSAM, merely presenting users of that website with pop-up deterrence messages is far from an adequate response. Rather, the appropriate response is for law enforcement authorities to investigate and take down such a website, and to arrest those responsible for knowingly hosting it.

Our second concern is regarding the logistics of the program: as reported, it is suggested that "artificial intelligence" and "psychographics" will be used to deliver pop-up messages when a user visits a website

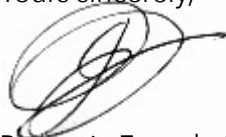
that is said to contain CSAM. Our understanding is that this is not technically possible unless all Internet usage is to be intercepted and processed. This amounts to the indiscriminate mass surveillance of Indian citizens, for which no legal basis has been demonstrated. Therefore, we hope that the logistics of the programme have been misreported and we would be grateful for some clarification about its parameters.

There are, indeed, good reasons to sensitise Indian citizens to the harms of CSAM and child abuse. However, public health experts tell us that there is no way to predict who is a potential child sexual abuser—they come from all classes, races, creeds, and walks of life. Therefore, experts recommend a primary prevention approach to the prevention of child sexual abuse. This means that the entire community should be targeted by abuse prevention messages—rather than focusing, for example, on pornography users.

We humbly suggest that the Humari Suraksha programme should be reevaluated. This should include a thorough legal review, and the publication of the programme's Standard Operating Procedure. We suggest that a more conventional public relations campaign about the harms of child sexual abuse, that targets the entire population, would be more effective and have a more secure legal basis than a programme that would insert pop-up messages into websites.

Please do not hesitate to contact us if we may be of any further assistance.

Yours sincerely,

A handwritten signature in black ink, appearing to be a stylized 'P' or similar initial, enclosed within a circular scribble.

Prostasia Foundation