

National Human Rights Commission
Research Division
File No: R-32/3/2020-PRPP

Minutes of the National Conference on Child Sexual Abuse Material (CSAM)
held on 2 to 3 March, 2023 at Vigyan Bhawan, New Delhi

The National Conference on Child Sexual Abuse Material (CSAM) was organized by the National Human Rights Commission on **2-3 March, 2023 at Vigyan Bhawan, New Delhi, in Hybrid Mode**, to derive recommendations/ actionable points for policy makers, intermediaries including content hosts, law enforcement agencies, etc., after having due deliberations among the stakeholders. The list of participants is annexed.

2. In addition to the Inaugural and Valedictory Sessions, the Conference consisted of panel discussions on various themes divided into five Technical Sessions as under -

Technical Sessions	Themes
I	CSAM: Understanding the Nature, Extent and Emerging Issues
II	Legal Provisions Relating to CSAM: Addressing Gaps
III	Role of Technology and Intermediaries in Prevention, Detection, and Investigation of CSAM
IV	International Trends in Fighting CSAM
V	Role of Enforcement Agencies and Cyber Forensics in Detection, Investigation and Monitoring of CSAM: Challenges and Solutions

The recommendations emanated from the Conference along with the suggestions emerging on the sidelines of the formal communications on the role of various stakeholders including intermediaries will be considered by the Commission to be sent to the Government for necessary action.

Day 1: 2nd March, 2023

Inaugural Session

3. On behalf of the Commission, **Shri Devendra Kumar Singh, Secretary General, NHRC**, extended his warm welcome to the Chief Guest, Shri Kiren Rijiju, Hon'ble Minister of Law and Justice, Mr. Justice Arun Mishra, Hon'ble Chairperson, NHRC, and other dignitaries and participants of the Conference. SG stated that the objective of the Conference is to have an open and constructive dialogue about the issue of production and distribution of CSAM which adversely affects the human rights of children. He stated the rationale of using a more victim-friendly term, CSAM, as against 'child pornography' since the latter undermines the seriousness of the abuse from the child's perspective. Lastly, he highlighted that while a total of 969 cases pertaining to online transmission of CSAM were registered with the National Crime Records Bureau (NCRB), many cases go unreported. The advancement of technology has further made transmission of online CSAM a real global threat and the same has become a full-time business. In this regard, it was hoped that the Conference would be able to deliberate and identify challenges associated with the system and further suggest measures to combat the same.

4. In his opening remarks, **Shri Rajiv Jain, Hon'ble Member, NHRC**, shared that the idea of having a conference of concerned stakeholders had its genesis in his meeting with Mr. Jürgen Stock, Secretary General, Interpol. He stated that NHRC had earlier organized a Conference on CSAM which was attended by more than 100 participants and two advisories on rights of children, including cyber exploitation had also been issued by the Commission. He mentioned in brief about the international legal instruments protecting the rights of children, viz., Geneva Declaration of the Rights of the Child, 1924, the International Covenant on Economic Social and Cultural Rights (ICESCR), and the International Covenant on Civil and Political Rights (ICCPR) in 1966, the Convention on the Rights of the Child, 1989, and its Optional Protocol in 2002.

5. Shri Rajiv Jain underlined the various legal and administrative measures undertaken to address the proliferation of CSAM in India, including the recent amendments to the Information Technology Act, 2000, that mandate the 'significant social media intermediaries' to take proactive measures to block CSAM content and the Memorandum of Understanding (MoU) with NCMEC that allows the NCRB to access 'Tipline Reports' which are forwarded to different state Police cybercrime units. Lastly, he exhorted all the stakeholders present in the Conference to recommend steps on what more can be done to prevent, detect and prosecute the offenders of CSAM.

6. **Mr. Justice Arun Mishra, Hon'ble Chairperson, NHRC**, welcomed the Chief Guest, Shri Kiren Rijju, Hon'ble Minister of Law and Justice and other dignitaries and participants of the Conference. He stated that this year marks 75 years of Universal Declaration of Human Rights (UDHR). He remarked that while the advent of Internet and technology ensures transparency, rights and information, the same has also been misused to infringe civil and human rights, including individual privacy. He noted with concern that 96 percent of cyberspace is dark web and according to the National Cyber Crime Reporting Portal of the Ministry of Home Affairs, India is emerging as one of the most vulnerable countries in the world. He highlighted the various means of dissemination and consumption of CSAM which are via emails, messages, chat rooms and peer-to-peer networks and noted with concern that online CSAM is one of the worst forms of child abuse that has a severe psychological impact on children.

7. The Hon'ble Chairperson noted that cybercrimes like CSAM can be dealt effectively through digital forensic development, education and training of investigating officers, lawyers and judges. Lastly, he mentioned the various legal provisions for addressing CSAM and the pivotal role played by the intermediaries, including Internet Service Providers for prevention and distribution of CSAM. He ended by urging all the stakeholders to come together and ensure a safe and secure digital world for children in the country.

8. The Chief Guest **Shri Kiren Rijju, Hon'ble Minister of Law and Justice**, gave the inaugural address. He commended the efforts of the NHRC for organising the conference on a very relevant subject and expressed confidence that the Conference will make everyone aware of their duties and responsibilities with respect to the necessary steps to be taken for addressing CSAM. He stated that the society needs to go beyond the existing legal provisions and the nation cannot celebrate any achievement if its women and children are not safe.

9. The Hon'ble Minister stated that while all crimes are bad, crimes against children are difficult to digest. He urged everyone to be more responsive to the needs of the time and assured that the Government will do everything to address the proliferation of CSAM. He mentioned about the Fast Track Special Courts Scheme wherein 389 courts are exclusively earmarked for speedy disposal of cases pertaining to rape and POCSO Act. Lastly, he stated that India, as a democratic nation, has the means to deal with any challenge and everyone should come together to fight this through on-ground implementation of legislative actions, strengthening investigation agencies and forensic labs, organisation of similar events at the state level and closer coordination between the Central and State governments as well as the Judiciary and the Executive. He ended by reiterating that addressing sexual abuse against women and children must be a priority for Government and civil society alike. Further, the Ministry would not only cooperate with the Commission in the outcome of the Conference, but also be a part of the team in dealing with the menace of CSAM.

10. **Dr. D. M. Mulay, Hon'ble Member, NHRC**, extended the vote of thanks to the Chief Guest, Shri Kiren Rijju, Hon'ble Minister of Law and Justice and other dignitaries and participants of the Conference and summarized the points made by the speakers of the Inaugural Session.

Technical Session I: CSAM: Understanding the Nature, Extent and Emerging Issues

11. The session was chaired by **Dr. D.M. Mulay, Hon'ble Member, NHRC. Ms. Indra Mallo, Joint Secretary, Ministry of Women and Child Development**, highlighted the relevant provisions of the Constitution of India and various laws pertaining to CSAM. She underlined the efforts of the Ministry to ensure justice to child victims including establishment of Fast Track Special Courts, child helpline 1098, child friendly procedures like interim compensation, speedy trial and appointment of support persons and para-legal volunteers. In order to strengthen child protection in distressed situations and child welfare initiatives, the helpline is being brought under the district administration and is also being strategically integrated with Emergency Response Support System (ERSS). Further, in order to ensure community engagement and assess vulnerability of children at the local level, the Panchayati Raj Institutions (PRIs) are made a part of the Mission Vatsalya Guidelines. Lastly, she highlighted the link between missing children and cases of child sexual abuse and underscored the importance of encouraging mandatory reporting and higher conviction rate of cases pertaining to child sexual abuse in creating deterrence.

12. **Shri Vivek Gogia, Director, NCRB**, explained the difference between CSAM and 'pornography' wherein the issue of consent does not arise in any case pertaining to material depicting child sexual abuse. He stated that the data pertaining to CSAM, reported by NCRB, may not reflect the total number of cases as the 'Principal Offense Rule' is followed for data collection wherein legal provision pertaining to a more heinous crime will take precedence, but there is an increasing trend in the number of cases reported owing to increased awareness amongst Law Enforcement Agencies (LEAs), expansion of digital technology and intervention by media/ civil society.

13. He mentioned about the MoU signed between NCRB and the NCMEC, USA, for receiving tiplines pertaining to CSAM originating from India which are then shared with the

concerned states and UTs through the National Cybercrime Reporting Portal for further action. Further efforts undertaken by NCRB on addressing online CSAM include creation of a National Database of Sexual Offenders (NDSO) which is accessible to all LEAs for antecedent verification, investigation and prevention of crime; the Investigation Tracking System for Sexual Offences (ITSSO), developed for real time monitoring and management of cases of rape and POCSO which had led to a tremendous increase in compliance and rate of disposal of criminal cases registered under the POCSO Act in last two years; anonymous reporting of content on the online portal; and the creation of the National Cybercrime Training Centre (CyTrain) as a part of the Massive Open Online Courses (MOOC) platform under the Indian Cyber Crime Coordination Centre (I4C) vision of the Ministry of Home Affairs (MHA) that ensures capacity building of LEAs, prosecutors, and judges.

14. **Major Vineet Kumar, Founder and President, CyberPeace Foundation**, highlighted the increase in volumes of CSAM being circulated on the surface web as well as the dark web, including messaging and online gaming platforms. He explained the research done by his organisation on exchange of CSAM on different messaging platforms. He informed that CyberPeace had collaborated with various stakeholders to raise awareness and educate people about different patterns and cases of CSAM through and an informal Cooperation Council was set up to collaborate with neighbouring countries on cases of CSAM and trafficking.

15. **Shri O.P. Singh, CEO, India Child Protection Fund**, identified the three variables pertaining to sexual abuse of children, viz., anti-social trait in the offender, a sexual interest in children and situational factors like access to children. He explained the nature and various forms of online child sexual abuse, viz., sextortion, grooming, self-generated live streaming of CSAM. He noted that, with increase in number of active internet users, the extent of problem had become truly alarming and accordingly identified various challenges and suggestions in dealing with the same.

16. **Ms Sunitha Krishnan, Founder, Prajwala**, explained in detail the efforts undertaken by her organisation in addressing circulation of online CSAM, including 'shame the rapist' campaign and filing a petition in the Supreme Court regarding circulation of objectionable content online which opened a Pandora's box with respect to the extent and magnitude of CSAM circulated in the country. She underlined the various legal and administrative measures undertaken by the Government as a result of the petition. She also highlighted the global nature of the problem of CSAM as well as profile of child victims of CSAM which includes infants as young as one day babies, infants and toddlers and identified four verticals of CSAM, viz., the child victim, the person generating the content, the person distributing the content and platforms that enable distribution of CSAM. She noted with concern that the profile of abusers varies from somebody who is known to the victim, minors, could be men or women, paedophiles, etc. She lastly flagged the core issues in addressing CSAM and suggested measures to combat the same.

17. **Ms Uma Subramanian, Co-Founder and Director, Rati Foundation** (formerly *Aarambh* India Initiative), explained everyone about the working of the hotline launched by them in partnership with the Internet Watch Foundation in 2016, to work with victims of child sexual abuse. She shared factual data from another helpline service launched by Rati a

few months ago which indicates that 52 percent of the victims are confined to the five states of UP, Maharashtra, Karnataka, Delhi and Rajasthan; 74 percent of victims are women and girls with majority of them falling in the age group of 16-25. She highlighted the various categories of CSAM reported and the trends in proliferation of CSAM which include material created out of revenge and doxing, extensive grooming of child victims, and asymmetry in control over data by the perpetrator.

18. **Ms Vidya Reddy, Co-Founder, Tulir - Center for the Prevention and Healing of Child Sexual Abuse**, while appreciating the amendment of 2007 IT Act, which strengthened the provisions for publishing or transmitting material depicting children, added that many people face sexual violence while growing up and CSAM is perpetuating violence against children. She highlighted that the police personnel are unable to decide the appropriate Sections and hence in many cases the registered complaint fails to clearly present the nature of the crime. She mentioned the challenges in prosecuting people watching CSAM and also highlighted the issue of 'sexting' among young generation and unavailability of laws in India to govern this emerging issue. She proposed to have a specialized unit to deal with CSAM and the trauma and impact on the mental health of officials investigating the CSAM cases.

19. **Challenges/ Recommendations emanated from Technical Session I**

- i. Use of end-to-end encryption services by messaging platforms makes it difficult for LEAs to track and investigate cases pertaining to online CSAM.
- ii. Public reporting of circulation of online CSAM is low owing to which LEAs in India are largely dependent on foreign agencies for requisite information. The National Cybercrime Reporting Portal is not very effective in registering cases, responding, and providing status update to NCRB.
- iii. We do not have a national database of CSAM with hash values of known CSAM which can be blocked by intermediaries.
- iv. Identification of the victim is not accorded priority especially in cases wherein the victim is too young to report.
- v. Our focus has largely been on the uploading and disseminating of CSAM and content generation has not been addressed comprehensively.
- vi. Define clear protocols with executive orders for enforcement mechanism on dealing with cases of CSAM.
- vii. Designing a uniform content on online safety which is customised for different stakeholders and subsequently build their capacities.
- viii. Need to upgrade and provide specialized cutting-edge tools and capacity building exercises. The courses on CyTrain portal need to be regularly upgraded with changing technology. This would in turn require funding and cooperation with private sector and civil society.
- ix. Collection and sharing of good practices followed across the globe.
- x. Technological methods like hotspot mapping, predictive policing, geographic information system (GIS), and identity resolution can be used to identify repeat offenders as they are large in number.
- xi. Use of monitored child-friendly SIMS and internet connection to prevent exposure of children to age-inappropriate content.

- xii. Need to set up a task force with a Youth Advisory Council to provide inputs on the on-ground situation.

Technical Session II: Legal Provisions Relating to CSAM: Addressing Gaps

20. The session was chaired by **Mr. Justice Arun Mishra, Hon'ble Chairperson, NHRC**. He highlighted various Constitutional and legal provisions pertaining to sexual abuse and exploitation of children including Articles 23 and 45 of the Constitution of India, the United Nations Convention on the Rights of the Child, 1989, the Budapest Convention, Sections 67B, 67C and 79 of the Information Technology Act, 2000, Sections 14, 17 and 19 of the POCSO Act and Section 294 of the Indian Penal Code, 1860. He mentioned about the directions issued by the Supreme Court regarding circulation of videos depicting child sexual abuse in the case of Prajwala. Lastly, he requested the speakers to point out legal gaps and identify the role of various stakeholders in filtering CSAM so that the issue may be adequately addressed.

21. **Ms N.S. Nappinai, Advocate, Supreme Court**, stated that CSAM is a zero-tolerance offense and addressing it cannot be simplistic or a 'one size fits all' approach. She mentioned about the ad-hoc committee set up by the United Nations Office on Drugs and Crime (UNODC) to combat various transnational crimes including cybercrime issues. She also stated that even though India did not sign up the Budapest Convention, we did adapt its construct under Section 67B of the IT Act that in turn gave wide powers to the police for combating CSAM. She stated that since CSAM is a borderless crime, it is essential that laws are harmonized across multiple jurisdictions for better enforcement. Lastly, she noted that the current process of addressing CSAM is mostly passive wherein content is taken down by the intermediaries once it is identified.

22. **Mr. Samir Dutt, Founder and CEO, ForensicsGuru.com**, pointed out that the hash values used by various LEAs for detection of CSAM are international hashes and there is a lack of India based hash values. He also discussed the use of Artificial Intelligence to establish the identity of perpetrators in CSAM and challenges in collecting forensic evidence from deleted files. Lastly, he identified certain gaps in laws with respect to collection of evidence and establishing the identity of perpetrators.

23. **Shri Ranjan Dwivedi (Retd. IPS), Special Rapporteur, NHRC**, shed light on the limitations faced by the LEAs in enforcing laws including a greater focus on procedures as against practicality. He highlighted the lack of focus on Indian languages vis-à-vis developing cybercrime specific glossary. He also identified the liability of Internet Service Providers (ISPs) under the various legal provisions dealing with CSAM in India.

24. **Ms Puneet Bhasin, Advocate**, highlighted the need to make children aware about the risks associated with the use of internet as perpetrators of CSAM may not always be adults and discussed the emerging forms of CSAM found in online games and digital avatars. She identified three areas that need to be focussed upon while addressing CSAM viz. age of criminality as with the changing times, digital technology is accessible to children now more than ever; the issue of online gaming sex wherein digital avatars are used to sexually abuse children online; and online trolling in the form of words/ comments on pictures of children. She stated that the same would have been covered under Section 66A of the IT Act; however, the provision was struck off and has not been replaced till date.

25. **Challenges/ Recommendations emanated from Technical Session II**

- i. There is a need to determine the age of criminality and the just punishment associated with the same that considers the sensitivity of a child who may be involved in the creation of CSAM.
- ii. Criminalising trolling or writing comments on the pictures of young children which may not be a part of graphic content, but, is still nevertheless sexually abusive.
- iii. With respect to criminalizing possession of CSAM, it is essential to determine the quantity of data that needs to be stored in a device for it to be prosecutable owing to the possibility of auto download or third parties dropping information into the devices.
- iv. Sexual abuse of children in online gaming needs to be classified as CSAM and accordingly criminalized.
- v. Mandate the presence of child mode features in all devices considering the misuse of Incognito mode by children.
- vi. Destruction of data by the perpetrators before they are caught is a challenge as it then becomes difficult to get clear hash values and it is not sure if segmented hashing of deleted files is admissible.
- vii. Specific laws to make the preparatory process an offence in unambiguous terms.
- viii. Harmonization of laws across jurisdictions as CSAM might be created, uploaded, shared and viewed from multiple jurisdictions.
- ix. Need to develop cyber security lexicon in languages other than English so that people are well educated and aware of the same.
- x. Use of AI/ fake profiles to depict itself as a child and trap potential perpetrators.

Technical Session III: Role of Technology and Intermediaries in Prevention, Detection and Investigation of CSAM

26. **Shri Rajiv Jain, Hon'ble Member, NHRC (Chair of the session)**, welcomed the members of the panel to share their views on the role of Intermediaries in implementing the law and monitoring the proliferation of CSAM on their platforms.

27. **Dr. Sanjay Bahl, Director General, Indian Computer Emergency Response Team (CERT-In), Ministry of Electronics and Information Technology**, explained the advantages as well as the disadvantages of using internet and social media and highlighted the need to use Artificial Intelligence in the Prevention, detection and investigation of CSAM. He stated that today technology can be used to detect CSAM through image and video analytics, machine learning and artificial intelligence. He identified 5 dimensions to mitigate the challenges of CSAM viz. technology, the creation dimension, i.e., how to generate or provide guidelines to label such content; the circulation dimension, i.e., platforms should have detection capability of identifying such content, curtailing the speed of circulation, and providing grievance mechanism; along with this, personal data should be considered part of data as per the Data Protection Act; the audience dimension, i.e., media literacy and awareness sector need to be addressed with reference to CSAM.

28. **Shri Vivek Narayan, DDG (DS), Department of Telecommunications, Ministry of Communications**, highlighted the multidimensional nature of the issue of CSAM. He explained the legal provisions pertaining to blocking of content by the Internet Service Providers and noted with concern the large amount of time taken by ISPs in blocking the

content which renders it ineffective. He flagged the issue of modifying DNS server and IP addresses by perpetrators in order to circumvent the law. Lastly, he assured that his department will periodically review the role of ISPs in combating CSAM.

29. **Shri Sanjeev Banzal, Director General, Education and Research Network (ERNET)**, shared factual data and highlighted the threat posed by increased proliferation of CSAM online through advancements in technology. He discussed various technological tools and innovations that are being used to monitor and filter CSAM like PhotoDNA, hash technologies, web crawlers, etc. He ended by urging the concerned stakeholders to work in coordination and cooperation in a mission mode.

30. **Shri Praveen Sharma, Vice President, Regulatory Affairs, TATA Communications Limited**, discussed the various legal, judicial, and administrative steps taken by India for curbing the menace of CSAM and the recommendations of the Ad-hoc Committee of Rajya Sabha to study the ‘alarming issue of pornography on social media and its effect on children and society as a whole’. The role of Intermediaries in proactively identifying CSAM, expeditiously removing content, reporting to the concerned authorities and publishing privacy policy and user agreement for usage of computer resource by any person was also discussed.

31. **Ms Aparna Bhat, Advocate, Supreme Court**, stated that social media platforms and other intermediaries have become the new crime scenes in the digital age and intermediaries must acknowledge that their spaces are being liable to be abused by perpetrators. She urged them to treat LEAs and CSOs as allies and not enemies. She highlighted that intermediaries often apply different standards in India as opposed to Europe and the US. She stated that if intermediaries are so concerned about the right to privacy they should not sell their data for advertising purposes. She highlighted the various steps taken by intermediaries to address CSAM viz. in-app reporting mechanisms, developing, and sharing technology to detect CSAM, etc. Lastly, various gaps in the response mechanism of intermediaries and recommendations to address the same were discussed.

32. **Mr. Joy Bandekar, Group President- Strategy and Planning, InShorts**, highlighted the challenges faced by law enforcement agencies to keep track of technology and pointed out the difference in the market size, culture of India and countries abroad which requires different strategies for addressing CSAM. He recommended storing of data of individuals uploading content on social media to create deterrence and ease of investigations.

33. **Ms. Anjali Hans, Senior Vice President, Regulatory & Corporate Affairs, Vodafone India Limited**, discussed the legal provisions of the IT Act and explained the unified license issued to ISPs by Department of Telecommunications (DoT) that prohibits carriage of objectionable obscene messages or communications in any form in the network, and provides that once specific instances are reported to the licensee by the enforcement agencies, or the licensor, the licensee shall take necessary measures to prevent carriage of such messages in its network immediately. She stated that the role of ISPs is limited to data transmission as they have no visibility or access to data flowing through their networks.

34. **Challenges/ Recommendations emanated from Technical Session III**

- i. SMS to every mobile phone through Telecom Service Providers every quarter/ month sensitising this issue with warning for violating law.
- ii. Integration of child helpline to single emergency number in addition to running '1098' exclusive number (let 1098 continue in parallel).
- iii. Develop SOPs and checklist for all stakeholders like mobile operators, content providers, ISPs, app developers, public broadcasters, app stores, etc. Take help of UNICEF document.
- iv. A centre called 'Child Cyber Protection Centre' can be setup which will be a single point centre for collaborating with stakeholders, e.g. law makers, policy makers, tech providers, Telecom and Internet Service Providers, etc.
- v. The chief information security officers of organizations also need to be sensitized to proactively identify cases where CSAM is stored or accessed by using organizational assets.
- vi. Funding R&D projects for developing tools and intelligent algorithms for analysis and detection of CSAM.
- vii. Use of AI, for example, to alert a child if the person that they are chatting with online is unlikely to be the one who they are claiming to be. AI can, in fact, analyze the use of language to spot traits that indicate grooming, or identify when someone is using anonymizing techniques like IP address masking, etc. Pop-up warning messages for searches related to CSAM.
- viii. Recording and storing the data of individuals uploading content on social media platforms as the same will act as deterrence and further make investigations easier.
- ix. In-house complaint mechanisms of intermediaries must be robust, responsive and time sensitive;
- x. Intermediaries must explore having partnerships in sharing CSAM information in the same way they share data for advertising. Information sharing must be real time given the nature of the problem.
- xi. End-to-end encrypted platforms must devise additional protocols/technology to prevent circulation.
- xii. Quarantining posts to enable AI to detect CSAM before publishing must be made mandatory.
- xiii. Age sensitive content on streaming platforms such as Netflix and social media platforms like Twitter, Facebook etc. should be restricted for underage children.

Technical Session IV: International Trends in Fighting CSAM

35. **Mr. Shombi Sharp, UN Resident Coordinator, United Nations India**, chaired the fourth technical session on international trends in fighting CSAM. He underlined the importance of addressing CSAM in protecting the human rights of children and furthering sustainable development. He highlighted WHO estimates according to which a billion children, aged 2-17 years, have experienced physical, sexual, emotional violence and neglect in past one year. Lastly, he highlighted that the incredible demographic dividend of India makes it imperative that all sections of the society come together to create a safe and nurturing environment for the youth, especially young girls and women.

36. **Ms Soledad Herrero, Chief, Child Protection, UNICEF India**, noted that India is driving the technological expansion in the global south and beyond and the advancement of

technology brings along the expansion of opportunities as well as risks. She highlighted the broad category of challenges faced by children online including sexual abuse and cyber bullying and commended the role played by the LEAs in addressing CSAM in India.

37. **Mr. Guillermo Galarza, Vice President, Partnerships & Law Enforcement Training, International Centre for Missing and Exploited children (ICMEC)**, highlighted the challenges faced by Law Enforcement Agencies (LEAs) in implementation of laws including lack of technology and manpower to investigate cases. He pointed out the recent trends in proliferation of CSAM through peer-to-peer networks and remarked that the focus should be more on the aspects of prevention, education and awareness at all levels. Lastly, he apprised every one of the efforts made by ICMEC in India towards addressing online CSAM which include developing gap assessment and a specialist unit to combat online child sexual exploitation to carry out effective investigations and save children from exploitation on the internet and the dark web.

38. **Ms Delali Mortty, Participation Manager, WeProtect Global Alliance**, underlined the need for meaningful participation of children and survivors in developing solutions as key visionaries and as vital decision makers in addressing CSAM and discussed its four forms viz. consultation with children, collaborating with them, instances where children are producing work and where they are leading work themselves. She shared insights of the mapping exercise of global initiatives of child participation wherein a majority of the response mechanisms involved child survivors for consultation purposes and highlighted the scope of collaborating with child victims of online sexual abuse.

39. **Mr. Marco Teixeira, Regional representative, United Nations Office on Drugs and Crime (UNODC), South Asia Regional Office**, delivered a pre-recorded video message wherein he gave suggestions for addressing online CSAM which include creating risk awareness, international cooperation through mutual legal assistance and rehabilitation of victims of CSAM.

40. **Ms Priti Mahara, Terre De Hommes, Netherlands**, advocated the concept of safety by design that focuses on anticipating harms and preventive measures. She highlighted the issue of lack of awareness and clear guidelines by the popular social media platforms using AI to recommend cyber fights to strangers and emphasised on following a uniform definition of a child as a person under 18 years of age and suggested addressing the issue as per the gender and different needs of children. She discussed the study conducted in different countries regarding potential intervention measures and their outcomes.

41. **Ms Antara Singh, Office of the United Nations High Commissioner for Human Rights (OHCHR)**, explained the mandate of the United Nations Special Rapporteur on the sale and sexual exploitation of children which includes collecting best practices, gaps and inputs from across the globe with respect to ways of combating CSAM. She highlighted the gendered nature of child sexual abuse material as most of the victims of CSAM are young girls and pointed out the lack of research on the online child sexual abuse of young boys owing to limited awareness and stereotypes and suggested various legal and administrative measures to prevent the proliferation of CSAM.

42. **Challenges/ Recommendations emanated from Technical Session IV**

- i. We need to build and invest in the digital empowerment of children

- ii. Domestic laws must ensure prosecution of perpetrators who are based out of the country but involved in proliferation of CSAM with the country.
- iii. Provisions pertaining to institution of civil action for providing compensation to the victims may be considered.
- iv. Data collection pertaining to CSAM should be in desegregated forms involving race, gender, age, caste, ethnicity or other socio-economic parameters to dig deeper and better understand the phenomenon.
- v. Credit card companies to apply technology for detection, blocking and alerting the authorities of any transaction related to CSAM.

Day 2 : 3rd March, 2023

Technical Session V: Role of Enforcement Agencies and Cyber Forensics in Detection, Investigation and Monitoring of CSAM: Challenges and Solutions

43. **Smt. Sundari Nanda, Special Secretary, Internal Security, MHA**, chaired the fifth session. She stated that proliferation of CSAM is not an isolated law and order issue and is rather connected to the development of the country and noted with concern that the scale of online CSAM has been increasing at an alarming rate. She highlighted the efforts undertaken by the Ministry of Home Affairs (MHA) to address the same which include the MoU signed between the NCMEC and NCRB through which the cyber tipline alerts are given to NCRB. Lastly, she discussed the methods used for automatic detection of CSAM, viz., the hash matching technology as well as artificial intelligence and deep learning.

44. **Mr. Rajesh Ranjan, Director (Government Affairs and Public Policy), Microsoft**, highlighted the efforts undertaken by Microsoft to minimize the menace of CSAM. He shared the global survey of parents and children related to online safety. He stated that the survey highlighted the kind of awareness that exists among children and parents with respect to the use of online safety tools. The PhotoDNA tool developed by Microsoft for detection of objectionable content was also discussed. He mentioned about the various initiatives taken by Microsoft to address CSAM including technology coalition involving collective action, information sharing, conducting research, developing technologies like video hashing, Project Alpha. Lastly, he shed light on the privacy related concerns resulting from deploying technology to monitor content online.

45. **Dr. Beulah Shekhar, Chair Professor, National Forensic Sciences University, Delhi Campus**, suggested ways to strengthen the existing legal framework so as to effectively address the menace of CSAM. She mentioned about the various digital forensic tools for examination of evidence like the 'Brain Electrical Oscillation Signature' (BEOS), automated polygraph lie detector, layered voice analysis, etc.

46. **Shri Viplav Kumar Choudhary, Joint Director, CBI**, highlighted various challenges based on his experience of dealing with cases relating to CSAM at CBI and mentioned about the three basic forms of distribution of CSAM, viz., sharing of videos/images, online grooming, and live streaming. He also highlighted the four categories of offenders, viz., child abusers, producers of CSAM who film sexual acts with the minors,

distributors of CSAM and lastly, viewers of CSAM. He explained the various operations conducted by CBI in order to identify the persons involved in the dissemination of CSAM, viz., Operation Carbon launched in 2021 that led to the discovery of various web based applications used for making payment for purchasing CSAM and various social media groups created for sharing CSAM. He noted that the profile of perpetrators who possessed CSAM inter alia included students, professionals, and software engineers. He stated that the International Child Sexual Exploitation database (ICSE database) of Interpol is an important tool for the identification of victims and the same has been used by CBI to conduct operations in Chittrakoot, Chandauli and Goa.

47. **Shri Harmeet Singh, Spl. DGP, Assam**, highlighted the psychological impact of proliferation of CSAM on the youth and emphasized upon the need of attitudinal change focussing on an empathetic approach across all stakeholders. He pointed out the increased instances of CSAM production in rural areas. Prolonged exposure to child sexual abuse material affects the mental health of the investigator, he noted. Based on the data given by NCMEC, he highlighted the limited role that Electronic Service Providers and Intermediaries are currently playing in monitoring and reporting CSAM online and noted with worry that Intermediaries take a lot of time in taking down reported content.

48. **Ms Nishanthani, DIG, Kerala**, presented the Kerala Model of LEAs in tackling proliferation of CSAM in the state that includes law enforcement, engagement with stakeholders, capacity building and empowerment of children, parents and teachers through conducting raids and cyber patrolling and highlighted the various programmes launched by Kerala police for empowerment of children and other stakeholders like the Kids Glove, Koottu, D-Safe, C0C0N. She spoke about Mission Grapnel, a tool developed to empower LEAs with cutting edge technology for detecting CSAM on the dark web. Lastly, capacity building measures in partnership with international organizations like ICMEC were also discussed.

49. **Shri Manoj Abraham, Director, Vigilance and Anti-Corruption Bureau (VACB), Kerala**, further shed light on the efforts made by the LEAs in Kerala in addressing CSAM. He stated that the Counter Child Sexual Exploitation (CCSE) Centre of Kerala Police is a collaborative initiative of all stakeholders and highlighted the various tools used by the LEAs for monitoring and investigation of CSAM cases like the Internet Crime Against Children-Child Online Protective Services (ICACCOPS) that allows identification of IP addresses of systems used for proliferating CSAM; the VIC Catalyst used for victim identification. He underlined the need to crawl into the dark web networks where a large volume of CSAM is circulated.

50. **Smt. Shikha Goyal, Addln. DGP, Women Safety Wing, Telangana**, underlined the efforts undertaken by LEAs in Telangana for addressing CSAM and the challenges thereof which include the establishment of She Cyber Labs to monitor CSAM activity, identifying suspects in the related networks, cyber patrolling with cyber intelligence by developing Web Application Firewall (WAF). She discussed the use of avatars by LEAs through fake profiles to identify perpetrators of CSAM online and infiltrate networks hosting CSAM. She also mentioned about sending BOTs to infiltrate the dark web accounts of suspects in order to discover their true identities.

51. **Shri Prashant Gautam, DCP, Cyber Cell, Delhi Police**, highlighted the increasing magnitude and severity of online CSAM and discussed various challenges and measures for monitoring and detection of online CSAM that is generally shared via P2P networks, darknet, Virtual Private Networks (VPN) and through E2EE services.

52. **Shri R.K. Srivastava, Senior Scientist, Directorate of Forensic Sciences (DFSS)**, highlighted the tools used in forensic examination which include the 'write blockers' for retention of original date and time stamps; and various hardware and software tools used to preview deleted or destroyed data along with live data. He explained the process of forensic examination and underlined the efforts undertaken to address CSAM including the establishment of National Cyber Forensic Laboratory (CFSL) at Hyderabad with a particular emphasis on indexing and processing data relating to POCSO cases.

53. **Shri Rajesh Kumar, CEO, Indian Cyber Crime Coordination Centre (I4C), MHA**, highlighted the seven verticals of I4C for addressing cybercrimes, including CSAM. These are, one, cybercrime threat analytic unit; two, national cybercrime reporting portal; three, national cyber forensic lab for capacity building and forensic examination of evidence; four, National Cyber Crime Training Centre; five, national portal for training investigation of cybercrimes; six, coordination of MHA with LEAs in seven centres for addressing issues relating to cyber-crimes; and seven, National Cybercrime Research and Innovation Centre. He discussed the trends of reporting cybercrime cases pertaining to women and children on the portal wherein he stated that a total of 2769 cases of videos involving R/GR content were reported in the year 2022. He also highlighted the variation among states with respect to registering FIRs that in turn requires capacity building and emphasized upon the need for converging efforts and information to identify trends and habitual offenders.

54. **Challenges/ Recommendations emanated from Technical Session V**

- i. Challenges in forensic examination include limitation of tools, damaged device/ deleted data, owing to proprietary encryption, around 20-30 percent of data from devices cannot be accessed without the permission of the respective electronic companies that charge a sum of money for providing access to data.
- ii. Since it is a specialized crime, the forensic investigator & forensic examiner entrusted with such cases must also be proficient to handle them. Their frequent shifting/ reshuffling will adversely affect the outcome.
- iii. For IP's/ proxy servers located outside India, bilateral agreements/ treaties with certain countries are required.
- iv. For re-construction of data, proprietary encryption & limitation of forensic tools, we need to develop indigenous forensic tools as currently there is monopoly of certain Original Equipment Manufacturers (OEMs).
- v. It takes considerable time in receiving consent for CBI investigation from the concerned State as there is no general consent for investigation by CBI by most of the states.
- vi. Investigation of cases involving minor offenders has to be completed within 60 days as per the JJ Act, failing which even the charge sheet cannot be instituted against them. However, the cases involving online CSAM require examination of electronic devices seized from the accused by the forensic experts which usually takes time.

- vii. Many of the cloud storage service providers do not have representatives in India, which makes it difficult for the LEAs to obtain information from them.
- viii. Social Media Platforms based in foreign countries do not provide the certificate for producing Digital Evidence of online content u/s 65B of the Indian Evidence Act and the same lowers the evidentiary value of data obtained from the Internet. Also, no representative of an ISP / Social Media Platforms ever comes to prove the content / information in the court of law.
- ix. Owing to low circulation, newly created CSAM may not easily come up on a hash search making it difficult to remove it.
- x. Use of CSAM detection tools like Microsoft PhotoDNA to. However, it is not available for use in the region. Specially designed web crawlers, like the ones used by Kerala Police, can be used to identify CSAM in darknet.
- xi. Focus on setting industry standards to generate uniform and lawful data request formats.
- xii. Develop national repositories of tools available for use by LEAs.
- xiii. Determination of the age of the victim from the video/ photograph available is a challenge especially if the content has originated from another country as age of sexual consent varies.
- xiv. The term 'Child Pornography' needs to be replaced with 'child sexual exploitation and abuse'. The terms 'cyber grooming' and 'sexually explicit' need to be defined. 'Sexually explicit' must also include images within its ambit.
- xv. Those who violate the mandatory reporting clause must be considered as abettors and penalty to be increased.
- xvi. Issues related to Compliance of Section 41A of CrPC.

Valedictory Session

55. **Shri Rajiv Jain, Hon'ble Member, NHRC**, welcomed Shri Rajeev Chandrasekhar, Hon'ble Minister of State for Electronics & IT and Skill Development & Entrepreneurship, Mr. Justice Arun Mishra, Hon'ble Chairperson, NHRC, and other dignitaries and participants of the Conference. He apprised the Minister of the proceedings of the Conference and remarked that the deliberations were meaningful and the same would be compiled in the form of recommendations to be submitted to the government.

56. **Mr. Justice Arun Mishra, Hon'ble Chairperson, NHRC**, while addressing the valedictory session of the conference, gave his concluding remarks and summarised the existing challenges in addressing CSAM which include inadequacy of infrastructure, effective implementation of laws, identification of victims, etc., and reiterated the need for a collaborative strategy of all stakeholders, awareness generation and adequate protection and psychological support for victims to combat CSAM. He noted that online child sexual abuse is a heinous crime and intermediaries cannot allow the proliferation of CSAM on their platforms under the guise of freedom of speech and expression. He remarked that innovation and technology is for the benefit of humankind and the same must not be used for self-destruction. He urged everyone to go back to the Indian culture and philosophy that is based on the protection of childhood.

57. Hon'ble Chairperson also stated that evolving technology has resulted in newer forms of misuse of internet by offenders and prevention is the only mode of curbing online CSAM. He underlined the need of making laws stringent to deal with the technological challenges pertaining to misuse of technology. He further noted with concern that while the human rights are uniform across the world, intermediaries are having different standards of compliance in different countries. Lastly, he expressed his gratitude towards the Hon'ble Minister and other dignitaries and participants for sparing their valuable time for the Conference.

58. **Shri Rajeev Chandrasekhar, Hon'ble Minister of State for Electronics & IT and Skill Development & Entrepreneurship**, delivered the valedictory address wherein he explained the importance of ensuring safety and happy childhood for every child in India. He remarked that though the internet and technology are powers of the good, the same has also been used as a space for thriving illegality, criminality and exploitation and expressed concern about the increased proliferation of online CSAM which is completely undeterred by any challenge of any law. He stated that intermediaries have escaped regulation and scrutiny for several decades under the garb of innovation, freedom of expression and privacy. He explained the vision of the Hon'ble Prime Minister of India of making the internet an open, safe and trusted place for every Indian.

59. The Hon'ble Minister mentioned about the provisions of the IT Act, 2000 and the Rules, 2021 that cast specific obligations on the intermediaries for addressing online proliferation of CSAM and remarked that the government and the intermediaries have a joint interest in making sure that the internet is safe, trusted and free from exploitation. He also informed about the proposed Digital India Act that is being drafted to address the challenges of the Internet in the present era. He also stated that proliferation of CSAM online is a consequence of the exploitation that is happening outside the Internet and should also be addressed. Lastly, he shed light on the new, emerging forms of CSAM in online gaming apps and the need to address the same.

60. **Smt. Anita Sinha, Joint Secretary, NHRC**, delivered a vote of thanks at the end of the two-day National Conference on Child Sexual Abuse Material (CSAM) and expressed gratitude on behalf of the Commission to the Chief Guest and other dignitaries and participants of the Conference. She summarized the important points mentioned by the Hon'ble Minister in his address. She also placed on record her sincere thanks to Mr. Justice Arun Kumar Mishra, Hon'ble Chairperson, NHRC and Dr. D. M. Mulay and Shri Rajiv Jain, Hon'ble members, NHRC under whose able leadership and guidance the Conference was successfully organized. Lastly, she thanked the various officers and officials for their cooperation and contribution in the organization of the Conference. She ended by stating that proliferation of CSAM has become a serious concern and hoped that the effort of the Commission would benefit all the participants in ensuring rights and safety of children.

List of Participants

I. Representatives of Ministries and other organizations of the Government of India and State Government(s)

1. Smt. Sundari Nanda, Special Secretary, Internal Security, Ministry of Home Affairs
2. Ms. Indra Mallo, Joint Secretary, Ministry of Women and Child Development (WCD)
3. Ms. Veena Kothavala, Joint Secretary, Ministry of Law and Justice
4. Mr. Viplav Kumar Choudhary, Joint Director, Central Bureau of Investigation
5. Shri Vivek Narayan, DDG (DS), D/o Telecommunications, Ministry of Communications
6. Shri Vivek Gogia, Director, National Crime Records Bureau
7. Shri Sanjeev Banzal, Director General, Education and Research Network (ERNET)
8. Dr. Sanjay Bahl, Director General, Indian Computer Emergency Response Team (CERT-In), Ministry of Electronics and Information Technology (MeitY)
9. Shri Rajesh Kumar, CEO, Indian Cyber Crime Coordination Centre (I4C), Ministry of Home Affairs
10. Shri R K Srivastava, Senior Scientist, DFSS, MHA
11. Shri Harmeet Singh, IPS, Spl. DGP, Assam
12. Ms. Nishanthini, DIG, Kerala
13. Shri Manoj Abraham, IPS, Director, Vigilance and Anti-Corruption Bureau (VACB), Kerala
14. Smt. Shikha Goyal, Addln DGP, Women Safety Wing, Telangana
15. Shri Prashant Gautam, DCP, Cyber Cell, Delhi Police
16. Sai Manohar, IPS, ADG (Security & Coordination) & OSD, MP Bhawan, Lokpriy Gopinath Bordoloi Marg, Chanakyapuri, New Delhi
17. Mr. Gopinath Jatti, IPS, DIG (Legal Deptt.), AP Police Headquarter, C/o 6th Battalion, APSP, Mangalagiri Guntur- 522 503
18. Smt. K.G.V Saritha, SP (Women Protection Cell), Andhra Pradesh Police
19. Mr. Harmeet Singh, IPS Spl. DGP, Assam Police
20. Mr. Ram Gopal Garg, IPS, DIG, Chhattisgarh Police
21. Shri Nidhin Valsan, IPS, SP (North), Porvorim, Goa Police
22. Naazneen Bhasin, IPS, DIG, Haryana Police
23. Shri Ajay Singh, Addl. SP Solan, Himachal Pradesh Police
24. Smt. Sandhya Rani Mehta, IPS, CID, Jharkhand Police
25. Ms. Nishantani, DIG, Kerala Police
26. Shri Dinesh Kumar Kaushal, AIG (CID), Madhya Pradesh Police
27. Shri Deepak Pandey, IGP of Special Unit for Prevention of Crime Against Women & Children, Maharashtra Police
28. Smt. Mamata Wahengbam, IPS, Inspector General of Police(HR), Manipur Police
29. Dr. Dara Aswaghosh, IPS, SSP (CID), Meghalaya Police
30. Smt. Simrit Kaur, IPS, AIGP, Punjab Police
31. Shri Rohan Pramod Botre, IPS, SP WCSO, Women & Child Security Organisation, Lucknow, UP Police
32. Ms. P Renuka Devi, IPS DIG (Law & Order), Uttarakhand Police

33. Shri Vichitra Veer, IPS, DCP (Crime), Delhi Police
34. Shri Prashant Gautam, DCP, IFSO, Delhi Police
35. Insp. Usha Rani, SHO/Women Police Station, Chandigarh Police

II. Representatives of International Bodies

1. Mr. Shombi Sharp, UN Resident Coordinator, United Nations India
2. Ms. Soledad Herrero, Chief, Child Protection, UNICEF India
3. Mr. Marco Teixeira, Regional Representative, Regional Office of South Asia, UNODC
4. Ms Antara Singh, Human Rights Officer, Office of the United Nations High Commissioner for Human Rights, OHCHR

III. Representatives of Internet Intermediaries

1. Mr. Praveen Sharma, Vice President, Regulatory Affairs, TATA Communications Limited
2. Mr. Joy Bandekar, Group President - Strategy and Planning, InShorts
3. Ms. Anjali Hans, Senior Vice President, Regulatory & Corporate Affairs, Vodafone India Limited
4. Mr. Rajesh Ranjan, Microsoft

IV. Representatives of Civil Society

1. Ms. Uma Subramanian, Director & Co-Founder, RATI Foundation
2. Mr. Siddharth Pillai, RATI Foundation
3. Major Vineet CEO, Cyber Peace Foundation
4. Ms. Shimoni Prasad, Senior Manager- External Communications and Projects Cyber Peace Foundation
5. Ms. Vidya Reddy, Executive Director & Co-Founder, Tulir Centre for Prevention & Healing of Child Sexual Abuse, Chennai
6. Ms Sunitha Krishnan, Co-founder, Prajwala, Telangana, Prajwala
7. Mr. Samir Datt, Founder and CEO of ForensicsGuru.com
8. Smt. Karuna Bishnoi, Independent Child Rights, Policy & Development Consultant
9. Ms. Priti Mahara, Child Rights Expert, Terre De Hommes, Netherlands
10. Mr. Subrat Kumar Panda, Terre De Hommes, Netherlands
11. Ms. N. S. Nappinai, Advocate Supreme Court, New Delhi
12. Ms. Aparna Bhat, Advocate Supreme Court, New Delhi
13. Adv. Puneet Bhasin
14. Dr. Parag Rughani, NFSU, Gandhinagar Campus
15. Dr. Beulah Shekhar, Chair Professor of Criminology, NFSU, Rohini, New Delhi
16. Mr. O.P. Singh, CEO, India Child Protection Fund (ICPF)
17. Mr. Sundar Krishnan, Technical Director, ICPF
18. Ms. Bhavya, Exec. Assistant, ICPF
19. Ms. Ragini Panth, Senior Manager, Policy & Research, CRY
20. Ms. Soledad Herrero, Chief, Child Protection, UNICEF India

21. Mr. Guillermo Galarza, Vice President, Partnerships & Law Enforcement Training, International Center for Missing & Exploited Children (ICMEC)
22. Ashok Motwani, Mumbai
23. Amod Kanth, Social Worker Kanth
24. Jitendra Kumar Singh
25. Ms. Sonakshi Radhika
26. Rani Patel, President Arohan/Transgender / Ragpickers/ Health
27. Ms Hemangi Sinha, Arjun Foundation, New Delhi
28. Seema Mathur, Counsellor
29. Mr Rahul Patil, Social Worker
30. Ms. Sushma Yadav, UIGC BPS Women's University

V. NHRC Officials

1. Mr. Justice Arun Mishra, Hon'ble Chairperson, NHRC
2. Dr. D. M. Mulay, Hon'ble Member, NHRC
3. Shri Rajiv Jain, Hon'ble Member, NHRC
4. Shri Devendra Kumar Singh, Secretary General, NHRC
5. Shri Manoj Yadava, Director General Investigation, NHRC
6. Shri Surajit Dey, Registrar (Law)
7. Smt. Anita Sinha, Joint Secretary, NHRC
8. Shri Devendra Kumar Nim, Joint Secretary, NHRC
9. Shri Arvind Nashier, PO
10. Smt. Meenakshi Sharma, PO
11. Shri Vinod Kumar Tiwari, PO
12. Shri Bipin Bihari Gautam, PO
13. Shri Sunil Kumar Meena, DIG
14. Shri Srinivas Kammath R., JR
15. Shri Anupam Sharma, SSP
16. Shri Indrajeet Kumar, DR
17. Shri K. K. Srivastava, DR
18. Shri Mukesh, DR
19. Dr. M.D.S. Tyagi, JDR
20. Shri J.K. Srivastava, DD (M&C)
21. Shri Sanjeev Sharma, SSA
22. Shri U.N. Sarkar, AD (P)
23. Smt. Anjali Saklani, AD(OL)
24. Shri Mahabeer Singh, Sr. PPS
25. Shri Sanjay Kumar, DS
26. Shri Arun Kumar Tewari, US
27. Shri D.M. Tripathy, US
28. Shri Sanjay Kumar, US
29. Shri Debindra Kundraa, AR
30. Shri Brijvir Singh, AR
31. Smt. Manju Rani, PPS
32. Shri Ramesh Chander, PPS

33. Shri S.K. Rawal, PPS
34. Shri Shaji D.B, PPS
35. Shri Sukhdev Singh, PPS
36. Smt. Usha Nair, PPS
37. Shri Manoj Kumar Nuna, PPS
38. Shri Amit Kumar Sharma, SA
39. Shri S.S.Gosain, AAO
40. Shri Anil Kumar Joshi, Accountant
41. Smt. Jyoti Sethi Roy, Accountant
42. Shri Anant Kumar, Assistant
43. Shri Ashok Rampuria, Assistant
44. Shri Bhaskar Balodi, Assistant
45. Shri Bikram Singh, Assistant
46. Shri E.k. Krishnan, Assistant
47. Shri Gajender, Assistant
48. Shri Jayanti Prasad, Assistant
49. Shri K. Krishna Kumar, Assistant
50. Ms. Kiran, Assistant
51. Shri M.D.Pillai, Assistant
52. Shri Mahesh Singh Chauhan, Assistant
53. Shri Manoj Kumar, Assistant
54. Shri Mathew Kurian, Assistant
55. Smt. Megha Kohli, Assistant
56. Mohammad Ather, Assistant
57. Shri N.S.Mahar, Assistant
58. Shri Nandan Singh Bisht, Assistant
59. Shri Narender Kumar, Assistant
60. Shri P.K. Kaien, Assistant
61. Shri Rajeev Yadav, Assistant
62. Shri Rakesh Kumar Nagvanshi, Assistant
63. Shri Ram Dhari, Assistant
64. Shri Ravinder Kumar, Assistant
65. Smt. Rekha Bhalla, Assistant
66. Ms. Rita Taneja, Assistant
67. Shri Ritu Raj, Assistant
68. Shri Saurabh Sharma, Assistant
69. Shri Shabdar Khan, Assistant
70. Shri Subhash Das, Assistant
71. Shri Surendra Singh Rawat, Assistant
72. Ms. Tabassum Ara, Assistant
73. Shri Y.C.Misra, Assistant
74. Shri Bimal Jit Uppal, DSP
75. Shri Dushyant Singh, DSP
76. Shri Isam Singh, DSP
77. Shri Kulbir Singh, DSP
78. Shri Lal Bahar, DSP

79. Shri M.S.Gill, DSP
80. Smt. Monia Uppal, DSP
81. Shri Rajendra Singh, DSP
82. Shri Ravi Singh, DSP
83. Smt Sunita Antil, Dy. Doc. Officer
84. Shri Arun Tyagi, Inspector
85. Shri B.S.Shekhawat, Inspector
86. Shri Chandra Shekhar, Inspector
87. Shri Jintu Saikia, Inspector
88. Shri Kulwant Singh, Inspector
89. Shri More Pradeep Dhondiram, Inspector
90. Shri Narendra Kumar Ojha, Inspector
91. Shri Randheer Kumar Singh, Inspector
92. Shri Ratan Sarkar, Inspector
93. Shri Santhosh Kumar R., Inspector
94. Shri Santosh Kumar, Inspector
95. Ms. Meera Rani, Jr. Trans.
96. Shri Ram Swaroop Nehara, Jr. Trans.
97. Shri Ajay Koli, PA
98. Shri Anmol Ratan, PA
99. Shri Bajrang Singh, PA
100. Shri Davinder Singh, PA
101. Smt. Harpreet Kaur Chaddha, PA
102. Ms. Jyoti Suyal, PA
103. Smt. Rakhee Ghosh, PA
104. Shri Ravi Panwar, PA
105. Smt. Seema Sharma, PA
106. Smt. Shilpi Chandola, PA
107. Smt. Sushila Pandey, PA
108. Shri Virender Singh Chauhan, PA
109. Shri Mohit Gupta, Programmer
110. Shri Clement Xess, PS
111. Shri D.P. Singh, PS
112. Shri Laxman Singh, PS
113. Shri Raj Kumar Goel, PS
114. Shri Rajiv Seth, PS
115. Smt. Rekha Verma, PS
116. Smt. Ritu Bhatia, PS
117. Shri Sanjay Bhalla, PS
118. Shri Suraj Mal, PS
119. Smt. Vandana Sah, PS
120. Shri Ajeet Kumar Sinha, SO
121. Shri Anil Kumar Sharma, SO
122. Shri Barjesh Kumania, SO
123. Shri Deepak Kumar, SO
124. Shri Hari Kishan Sharma, SO

125. Smt. Jasvinder Kaur, SO
126. Shri Kamal Kishore, SO
127. Shri Mukesh Kumar, SO
128. Shri Nishith, SO
129. Shri R. K. Puri, SO
130. Shri Santosh Kumar Sadangi, SO
131. Ms. Aakanksha Sharma, JRC
132. Ms. Ankita Jha, JRC
133. Ms. Aparna Tiwari, JRC
134. Ms. Architi Batra, JRC
135. Ms. Arpita Sinha, JRC
136. Ms. Dakshata Bajpai, JRC
137. Mr. Deepansh Tripathi, JRC
138. Ms. Dimpay Laskar, JRC
139. Mr. Jha Pranav Kumar, JRC
140. Ms. Kirti Vashitha, JRC
141. Ms. Lakshmi Kumari, JRC
142. Ms. Madhura Naniwadekar, JRC
143. Ms. Niharika Sharma, JRC
144. Ms. Prabnoor Kaur, JRC
145. Mr. Sajith Mohamad Saleem, JRC
146. Ms. Shilpi Jain, JRC
147. Ms. Shrija Singh, JRC
148. Ms. Smriti Pandey, JRC
149. Ms. Tejasvini Akhawat, JRC
150. MS. Akanksha Singla, LRC
151. Mr. Akshay Keshav Pradhan, LRC
152. MS. Akshita Garg, LRC
153. MS. Anamika Singh, LRC
154. Mr. Animesh Pareek, LRC
155. Mr. Anupam Shivam, LRC
156. MS. Anuveeta D. Chowdhury, LRC
157. Mr. Ashwani Kumar, LRC
158. MS. Avni Tiwari, LRC
159. MS. Ekta Bhadauria, LRC
160. MS. Ekta Jain, LRC
161. MS. Himani Kaushik, LRC
162. MS. Karishma Deep, LRC
163. MS. Manisha Jain, LRC
164. MS. Mehak Andrabi, LRC
165. MS. Prakriti Katyayan, LRC
166. MS. Pranitha P Pai, LRC
167. MS. Priya Chaudhary, LRC
168. MS. Priya Singh, LRC
169. Mr. Rishi Upadhyay, LRC
170. MS. Roopali, LRC

171. MS. Sakshi Ji, LRC
172. Shubhit Trehan, LRC
173. MS. Surashiya, LRC
174. MS. Sweety Mahi, LRC
175. MS. Tanvi Goyal, LRC
176. MS. Umang Katoch, LRC
177. Ms. Neeta Bisht, DEO
178. Mr. Anil Rajput, DEO
179. Mr. Karun Kumar, DEO
180. Mr. Bhavesh, DEO
181. Mr. Dheeraj Singh, DEO
182. Mr. Rahul, DEO
183. Mr. D.N. Jha, DEO
184. Mr. Satrughan Nishad, DEO