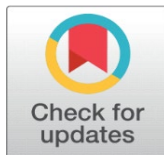


# ANALYZING FREEDOM OF EXPRESSION AND MEDIA SPEECH THROUGH CONSTITUTIONAL PERSPECTIVE OF INDIA

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## ABSTRACT

Freedom of speech and expression, guaranteed under Article 19(1)(a) of the Indian Constitution, serves as a foundational right essential for democratic governance. While the Constitution ensures these freedoms, it also imposes reasonable restrictions to maintain public order, security, and sovereignty. The media, often referred to as the "fourth estate," plays a crucial role in promoting public discourse, holding governments accountable, and fostering democratic ideals. This paper explores the evolution of press freedom in India, key Supreme Court rulings, and the legal frameworks governing media operations. The research underscores the delicate balance between freedom and regulation, emphasizing the need to protect democratic values while ensuring accountability. Ultimately, the paper argues that a free and independent press is essential for sustaining transparency, facilitating informed public participation, and strengthening the democratic process in India.

**Keywords:** Freedom of expression, media speech, Indian Constitution, Article 19(1)(a), press freedom, democracy in India, fourth estate, censorship, media regulation etc.

## 1. INTRODUCTION

The ability to communicate through speech is an inherent trait of human nature. Communication allows individuals to express emotions, ideas, and perceptions through both verbal and nonverbal means. This natural capacity establishes freedom of speech and expression as an inherent right. As a fundamental prerequisite for other liberties, the right to free speech is recognized as the cornerstone of civil rights in almost every civilized nation<sup>1</sup>. It encompasses the freedom to convey personal opinions or beliefs through spoken words, writing, visual representations, or gestures, among other mediums<sup>2</sup>. This right is widely regarded as essential for sustaining democracy, making its protection indispensable. Over the past 75 years, the media has evolved into the "fourth pillar,"<sup>3</sup> playing a pivotal role in public discourse alongside the judiciary, executive, and legislature. Its nationwide reach and growing influence make it a powerful force in educating citizens and raising awareness on critical social and political issues.

<sup>1</sup> Raza, A. (2016). 'Freedom of Speech and Expression' as a Fundamental Right in India and the Test of Constitutional Regulations: The Constitutional Perspective. *Indian Bar Review*, 43(2), 87-110.

<sup>2</sup> *Lowell v. Griffin* 303 US 444 (1939).

<sup>3</sup> Kumar, P., & Singh, K. (2019). Media, the Fourth Pillar of Democracy: A Critical Analysis. *International Journal of Research and Analytical Reviews*, 6(1).

The media's role in exposing corruption, monitoring governance, and informing the public ensures accountability and fosters democratic progress. By promoting transparency and reform, the media strengthens the foundations of democracy and contributes to social and political development. The right to freedom of speech and expression, enshrined in the Indian Constitution, also extends to the freedom of the press<sup>4</sup>. In 1950, the Supreme Court of India formally recognized this freedom, emphasizing the press's role in safeguarding citizens' rights by holding governments accountable. A robust press facilitates informed public participation and maintains checks and balances. This dissertation explores the evolution of press freedom in India, legal frameworks, restrictions, judicial interpretations, challenges, and the press's critical role in democracy.

## 2. UNDERSTANDING THE IDEA OF PRESS FREEDOM

The press plays a crucial role in disseminating information to the public and facilitating democratic engagement. While commonly associated with the printing press, the term 'press' encompasses various forms of media, including newspapers, magazines, and news services. In India, the press refers to establishments dedicated to printing and publishing materials like pamphlets and books. As a vital communication tool, the press serves as the primary information source for many citizens, acting as a "window to the world," according to Professor Joad<sup>5</sup>. Safeguarding press freedom is essential, as a free press ensures individual liberties and acts as an interpreter between the government and the people. The term "media," often used interchangeably with "press," includes print, electronic, and digital platforms, collectively serving as the "Fourth pillar" in society.

To discuss press freedom, it is essential to understand the concepts of freedom and liberty. The term "liberty" stems from the Latin word "Liber," meaning free and independent. Liberty involves the ability to act without constraints and includes both negative (absence of restrictions) and positive (presence of opportunities) dimensions. Thinkers like Montesquieu, Prof. Seely, and T.H. Green highlight liberty as both freedom from restraint and the capacity to pursue meaningful activities<sup>6</sup>. Constitutional frameworks, such as the Indian and U.S. Constitutions, emphasize freedom of speech and press while recognizing that absolute liberty is impractical.

## 3. THEORIES OF FREEDOM IN RESPECT OF PRESS AND MEDIA

Theories of freedom can be broadly divided into negative and positive perspectives. Article 19(1)(a) of the Indian Constitution reflects the concept of negative freedom, as developed by thinkers like Jeremy Bentham and John Stuart Mill. Negative freedom emphasizes the absence of external interference, allowing individuals to act without coercion. Isaiah Berlin described freedom as the degree to which one is free from interference by others, and Kramer's work distinguishes between being "unfree" due to human-imposed constraints and "not free" due to physical limitations<sup>7</sup>. On the other hand, positive freedom underpins Article 19(2) of the Indian Constitution. Thinkers like Rousseau argued that individuals trade natural liberty for social security through voluntary social contracts<sup>8</sup>.

Positive liberty extends beyond the absence of restrictions, emphasizing the ability to act according to genuine desires. Isaiah Berlin criticized the risks of positive liberty, but scholars like Hannah Arendt and Charles Taylor defended it. Arendt viewed freedom as a form of action, essential to politics, while Taylor distinguished between the "opportunity-concept" (negative liberty) and "exercise-concept" (positive liberty), where freedom requires both opportunity and action. In a democratic system, personal liberties, political freedoms, and representative institutions are interconnected. The ability to criticize and oppose the ruling party is essential to democracy. Constitutions recognizing individual rights cannot suppress political freedoms. Thus, political opposition and dissent are fundamental to democracy, allowing citizens to replace ruling factions through elections if they have public support, ensuring liberty and civil rights are upheld. In such background, the constitutional freedom ensures the right to convey opinions through verbal, written,

<sup>4</sup> The Constitution of India, 1950 Article 19 (1) (a).

<sup>5</sup> C.E.M. Joad, *The Principles of Parliamentary Democracy* (Falcon P 1949) 45.

<sup>6</sup> Dias, R. W. M. (1985). *Dias Jurisprudence*. LexisNexis.

<sup>7</sup> Berlin, I. (2017). Two concepts of liberty. In *Liberty Reader* (pp. 33-57). Routledge.

<sup>8</sup> Rousseau, J. & Dunn, S. (2008). *The Social Contract and The First and Second Discourses*. New Haven: Yale University Press.  
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visual, or symbolic forms, including gestures and signs. It encompasses press freedom, enabling the dissemination of one's ideas and the publication of others' views.

A free press is essential to the foundation of democracy, requiring the absence of censorship or restriction. Throughout history, governments have resisted press freedom, resulting in a long struggle to secure it. Press freedom allows individuals to express their views through various media, playing a vital role in democratic societies. William Blackstone emphasized that a free press entails no prior restraints on publication, though it does not shield against punishment for illegal content. Similarly, A.V. Dicey argued that while individuals have the right to publish freely, the press holds no special privileges under the law<sup>9</sup>. The Royal Commissions on the press (1947-48 and 1977) underscored the importance of press freedom, noting that democracy depends on the ability of journalists to publish facts and opinions without interference<sup>10</sup>.

Although the Indian Constitution does not explicitly guarantee press freedom, it falls under Article 19(1)(a), which protects freedom of speech and expression. This broad definition covers not only verbal communication but also printed, virtual, and other forms of expression. In India, the concept of press freedom is dynamic and open to interpretation. For some, it signifies the ability to publish without legal constraints, while others see it as freedom from bias. The First Press Commission defined it as the right to hold opinions and share information freely through printed words. Similarly, the Press Council of India stated in the Verghese Case that press freedom involves expressing ideas and information through various mediums without interference from government or social entities.

#### 4. HISTORICAL BACKGROUND OF FREEDOM OF PRESS

Throughout history, individuals, especially men, have fought to protect their right to express themselves freely. Many have risked or sacrificed their lives to secure this fundamental freedom, often resulting in new laws or even conflicts. A notable example is the Greek philosopher Socrates (470–399 B.C.), whose ideas were seen as corrupting the youth of Athens. Despite being sentenced to death, Socrates used his trial to defend free speech, stating, "Gentlemen of Athens, I shall obey the divine rather than you<sup>11</sup>." He asserted that even if given a reprieve, he would continue to speak freely, regardless of the consequences, including death.

In ancient Rome, freedom of expression fluctuated. As the empire expanded, restrictions increased, particularly under Emperor Tiberius (14–37 C.E.), who suppressed dissent<sup>12</sup>. During this period, Jesus was executed under Roman rule, influenced by Jewish authorities, who also tried to silence his followers. This repression shows that limiting speech was not unique to Roman governance. The struggle for free expression persisted over centuries, with rights being granted, revoked, or contested. During the Middle Ages, efforts emerged to establish legal protections through formal declarations. One key milestone was the Magna Carta, which set limits on governmental power. Later, the Virginia Declaration of Rights (1776), the French Declaration of the Rights of Man (1789), and the English and U.S. Bills of Rights (1689 and 1791) further cemented free speech as a critical right. Thinkers like John Milton also championed this cause, with his 1644 pamphlet *Areopagitica* advocating for press freedom.

In India, the history of free expression can be divided into pre- and post-independence periods. During British rule, journalists faced harsh restrictions, as colonial authorities were intolerant of criticism. Editors were censored, harassed, and even exiled without trial between 1791 and 1799<sup>13</sup>. The Bengal Government imposed laws requiring government approval before newspapers could be published, with violators sent back to Europe. Lord Hastings later eased press

<sup>9</sup> Venn Dicey, A. (2007). Introduction to the Study of the Law of the Constitution: Introduction to the Eighth Edition (1915). *Giornale di storia costituzionale*: 13, I, 2007, 171-229.

<sup>10</sup> Finger and McGregor Commission, Final Report of Royal Commission on Press (Finger and McGregor Commission) (1974-1977) 8 – 9.

<sup>11</sup> Preus, A. (2024). Socrates, Athenian Citizen. In *Principles and Praxis in Ancient Greek Philosophy: Essays in Ancient Greek Philosophy in Honor of Fred D. Miller, Jr.* (pp. 45-59). Cham: Springer International Publishing.

<sup>12</sup> McHugh, M. R. (2004). Historiography and freedom of speech: the case of Cremutius Cordus. In *Free Speech in Classical Antiquity* (pp. 391-408). Brill.

<sup>13</sup> Chatterjee, R. (1929). Origin and growth of journalism among Indians. *The Annals of the American Academy of Political and Social Science*, 145(2), 161-168.

censorship, though James Silk Buckingham, editor of the *Calcutta Journal*, faced expulsion after criticizing the government. Despite these challenges, reformers like Raja Rammohun Roy fought for press freedom, viewing it as essential for protecting individual liberty.

After India gained independence in 1947, the role of the press was recognized as crucial in the fight for freedom. The Indian Constitution, adopted in 1949, guarantees citizens the right to free speech and expression under Article 19(1)(a). Although press freedom is not explicitly mentioned, the courts have interpreted it as part of this fundamental right. Restrictions on speech are allowed under Article 19(2) to safeguard public order, morality, and national security. During emergencies, these freedoms may be suspended, but courts have drawn from U.S. precedents to uphold free speech since the 1958 *Express Newspapers* case. With the rise of technology, the concept of press freedom has evolved to encompass electronic and social media. In *Minister of Information and Broadcasting v. Cricket Association of Bengal*, the Supreme Court ruled that the right to free speech includes broadcasting through television and radio<sup>14</sup>. The 1990s saw increased private media ownership, reducing government control. Laws like the Prasar Bharati Act further limited state influence over the press, enhancing media independence in modern India<sup>15</sup>.

## 5. CONSTITUTION AND LEGAL PROVISION FOR FREEDOM OF PRESS IN INDIA

In the Indian Constitution, the preamble reflects the nation's core values, including the liberty of expression. This concept guarantees individuals the freedom to think independently, express their opinions, follow personal beliefs, engage in religious practices, and worship freely. Additionally, liberty includes the right to a free press, a fundamental tenet in democratic societies. Recognized by the Universal Declaration of Human Rights (1948), press freedom ensures citizens' access to information essential for democracy. It is often said that liberty is as vital to individuals in democratic societies as oxygen is to life, underscoring the importance of free expression and the right to communicate ideas without obstruction. Historically, India lacked explicit legal protections for freedom of speech and the press before independence. As noted in the *Channing Arnold v. King Emperor* case, a journalist's freedom was equivalent to the general freedom enjoyed by ordinary citizens, without any higher privilege unless provided by law<sup>16</sup>.

The Indian Constitution, however, addresses this deficiency. The preamble guarantees fundamental rights, including the freedom of speech, expression, belief, faith, and worship. These principles are further solidified in Article 19(1)(a), which enshrines the right to freedom of speech and expression. In *Union of India v. Association for Democratic Reforms*, the Supreme Court highlighted that the absence of reliable information leads to an uninformed citizenry, weakening democracy<sup>17</sup>. Thus, the right to both disseminate and receive information becomes central to preserving freedom of expression. Press freedom is inherently tied to Article 19(1)(a). Although the Indian Constitution does not explicitly mention the press, the courts have consistently interpreted press freedom as a subset of the broader freedom of expression. As the Supreme Court explained, freedom of the press is not a special right but part of the general right to free expression. Therefore, the press enjoys no unique privileges over ordinary citizens, nor does it face restrictions beyond those applicable to individuals.

The essence of press freedom lies in three aspects: access to information, freedom to publish, and freedom to circulate. This framework ensures that newspapers can serve the public interest by providing essential information for democratic participation. In *Indian Express Newspapers (Bombay) Ltd. v. Union of India*, the Supreme Court emphasized that in a society where not all citizens have access to modern communication tools, the press plays a crucial role as a public educator. Newspapers contribute to both formal and informal education by informing citizens and shaping public opinion, often challenging governmental policies. The court reaffirmed in *Printers (Mysore) Ltd. v. CTO* that while press freedom is protected under Article 19(1)(a), it is not an absolute right and remains subject to reasonable restrictions outlined in Article 19(2).

<sup>14</sup> Ministry of Information and Broadcast v Cricket Association of Bengal 1995 2 SCC 161.

<sup>15</sup> Jayasimha, S., & Shuvamandal. (1997). Freeing the airwaves. *National Law School Journal* 9(1), 33.

<sup>16</sup> Channing Arnold v King Emperor 16 BOMLR 544, 1914.

<sup>17</sup> Union of India v Assn. for Democratic Reforms 5 SCC 294, 2002.

The Indian judiciary has maintained a delicate balance between press freedom, individual privacy, and the right to a fair trial. In *R. Rajagopal v. State of Tamil Nadu*, the court ruled that the media could publish content about public figures, provided it does not encroach on their private lives without just cause. The court also warned against sensational reporting, which can prejudice legal proceedings and jeopardize the right to a fair trial, as outlined in *Zahira Habibullah Sheikh v. State of Gujarat*<sup>18</sup>. This underscores the importance of responsible journalism in safeguarding both personal rights and judicial impartiality. Economic and commercial dimensions of press freedom are regulated under Article 19(1)(g), which protects the right to practice any profession or business, including journalism.

In *Bennett Coleman & Co. v. Union of India*, the Supreme Court struck down a government policy restricting newsprint as it infringed on press freedom by limiting circulation and advertising revenue. Similarly, in the *Eenadu* case, the court ruled that while the government could decide how to allocate public funds for advertisements, it could not use its financial power to suppress critical voices in the media. Commercial speech also enjoys protection under Article 19(1)(a). In recent rulings, the Supreme Court recognized advertisements as a form of free expression, entitling them to constitutional safeguards.

Furthermore, the court has reinforced the public's right to access information, as seen in *Prabhu Dutt v. Union of India*, where it ruled that the press has a right to seek news on government activities<sup>19</sup>. However, this right is not without limits; in *State v. Charita*<sup>20</sup>, the court held that media access to prisoners must be controlled to protect the integrity of ongoing legal proceedings. The judiciary views press freedom as the cornerstone of democratic governance, often referred to as the "fourth pillar of democracy." It plays a vital role in promoting transparency and holding authorities accountable. However, the courts have also cautioned that press freedom should not be abused to undermine other fundamental rights. The balance between free speech, public interest, and individual rights is crucial to maintaining a healthy democracy.

## 6. LIMITATIONS ON FREEDOM OF THE PRESS

The right to free speech and press is not absolute though. As Lord Denning remarked in *Road to Justice*, while the press serves as a watchdog to ensure fair trials, it sometimes oversteps boundaries and needs regulation. Similarly, Article 19(2) of the Indian Constitution allows the government to impose reasonable restrictions on free speech for specific purposes. These restrictions must be imposed through law, not executive orders. Courts assess their reasonableness using the standard of an "average prudent person" and ensure they balance personal freedoms with public interest.

Freedom of speech can be curtailed when national security is at risk, including cases of terrorism, rebellion, or external aggression. However, only speech directly linked to public order violations that threaten state security can be restricted. In a recent judgment, the Supreme Court struck down the ban on the Malayalam news channel *MediaOne*, with Chief Justice D.Y. Chandrachud stating that denying rights under the guise of national security undermines the rule of law. Similar restriction is there with respect to Friendly Relations with Foreign States, which was introduced by the First Constitutional Amendment to prevent harmful publicity against friendly nations<sup>21</sup>. Although India has specific laws, such as the Foreign Relations Act, that penalize insults to foreign dignitaries, the suppression of legitimate criticism of foreign policies is not justified. Notably, Pakistan, as a Commonwealth member, is not classified as a foreign state, so speech critical of Pakistan cannot be restricted on this ground.

The First Constitutional Amendment also introduced "public order" as a ground for restriction. Public order refers to maintaining societal peace and tranquility. The Supreme Court differentiated between public order, law and order, and state security in *Kishori Mohan v. State of West Bengal*. A regulation aimed at maintaining peace must have a direct link to public order to be upheld. For instance, speech that deliberately offends religious sentiments can be restricted to prevent public unrest, but mere criticism of the government does not qualify. The Indian Constitution also considers obscenity and indecency as grounds for restricting free speech. The *Hicklin Test*, established in an English case, defines

<sup>18</sup> *Zahira Habibullah Sheikh v State of Gujarat* (2004) 4 SCC 158.

<sup>19</sup> *Prabhu Dutt v Union of India* AIR 1982 SC 6.

<sup>20</sup> *State v Charita* AIR 1999 SC 1379.

<sup>21</sup> The Constitution (First Amendment) Act, 1951.

obscenity as material that corrupts minds open to immoral influences. In *Ranjit Udeshi v. State of Maharashtra*, the Supreme Court upheld this standard, convicting a bookseller for selling *Lady Chatterley's Lover*<sup>22</sup>.

Indian Penal Code Sections 292–294 restrict the sale and distribution of obscene materials, reflecting society's evolving moral standards. Speech that incites illegal acts can be restricted to prevent lawbreaking. Additionally, statements undermining India's sovereignty and integrity are prohibited, as introduced by the 62nd Amendment. Freedom of speech cannot be used to insult the judiciary or interfere with justice either. The Contempt of Courts Act, 1971, regulates such offenses, although constructive criticism of judges is allowed. Defamation laws under Section 499 of the Indian Penal Code also restrict speech that harms an individual's reputation.

## 7. AUTHORITIES REGULATING FREEDOM OF MEDIA

The autonomy and independence of the media are crucial for the development of democracy, serving as a vital link between the public and the government. In India, various regulatory bodies such as the Press Council of India (PCI) and Prasar Bharti oversee media operations, ensuring adherence to constitutional provisions that protect press freedom. The Constitution of India guarantees the right to freedom of speech and expression under Article 19(1)(a), which implicitly includes press freedom. However, this right is subject to reasonable restrictions outlined in Article 19(2). Dr. B.R. Ambedkar emphasized that while individual citizens possess this right, the press has evolved into an institutional entity that serves a broader societal purpose. This transformation reflects the changing dynamics since India's independence. In the landmark case of *Miami Herald v. Tornillo*, the U.S. Supreme Court ruled that press responsibility cannot be mandated by law, emphasizing that while a responsible press is desirable, it is not constitutionally required.

This ruling highlights the difference between individual rights and those of the press as an institution. Ambedkar's views resonate with this notion, asserting that journalists, like any other citizens, should exercise their freedom of expression without special privileges. Historically, cases such as *Arnold v. Emperor* established that journalists enjoy the same freedoms as ordinary citizens, but without additional exemptions granted by law. This perspective aligns with British legal traditions and was echoed in American jurisprudence during that era. Justice Felix Frankfurter later asserted that press freedom equates to every citizen's freedom, although contemporary interpretations have evolved.

The Press Council of India was established in 1965 to safeguard press freedom and improve journalistic standards. Its formation stemmed from a recognition of the need for an autonomous body to oversee media practices and protect against external influences. The PCI Act outlines its objectives, which include promoting ethical journalism and maintaining editorial independence. The Council operates under a framework that includes a chairman, typically a former Supreme Court justice, and members representing various sectors of society. Its functions involve setting guidelines for newspapers and enhancing civic accountability. Funding for the PCI comes from fees imposed on registered newspapers based on circulation figures. Despite its authority to censure and investigate complaints against media entities, the PCI faces limitations in enforcing its directives effectively.

## 8. THE CHALLENGES IN FREEDOM OF MEDIA IN A DEMOCRACY

The media plays a vital role in shaping public opinion and maintaining democracy. However, since media operations are driven by individuals with their own biases, ideologies, and principles, challenges arise. In today's competitive environment, the media has become a commercial enterprise focused on profit. This race for financial gain often leads to biased, sensationalized, and rushed journalism. Television channels, in particular, operate under intense time constraints to publish news quickly, resulting in compromised quality. To address these challenges, a regulatory mechanism is necessary. Mahatma Gandhi advocated for self-regulation, warning that unchecked media power could cause significant harm, likening it to a flood that destroys crops. While external regulation could be damaging, Gandhi believed that internal discipline could yield better results.

However, journalists are not immune to external pressures, and personal gains can sometimes influence their work. At the same time, journalists often face resistance from government authorities, especially when exposing wrongdoing. This tension between the media and the state can strengthen democracy by holding those in power accountable. A regulatory

<sup>22</sup> Ranjit D. Udeshi v State of Maharashtra AIR 1965 SC 881.

body with individuals of impeccable integrity, independent from government influence, would help maintain media ethics. The government of India has implemented several media laws since independence to regulate the media within a legal framework. However, press freedom extends beyond these regulations, encompassing journalistic integrity and autonomy.

Landmark Supreme Court judgments, such as *Romesh Thappar v. State of Madras*, have underscored the importance of press freedom, emphasizing that political discourse and public education are essential for democracy. The media plays a crucial role in distributing news, opinions, and ideas across multiple platforms, including newspapers, television, radio, and the internet. In a diverse society like India, the media serves as a catalyst for development and social change, empowering marginalized groups and challenging societal norms<sup>23</sup>. It acts as a watchdog by exposing corruption, inequality, and misconduct, thus bridging the gap between the government and the public. In a democracy, the media must remain loyal to society, not the government. Scholars believe that the watchdog journalism functions best when it highlights issues that affect people's lives, promotes transparency, and holds both offenders and victims accountable<sup>24</sup>. While the media is not without flaws, its ability to spark dialogue and foster positive change makes it an indispensable pillar of democracy.

## 9. CONCLUSION

The research concludes that while the press plays a pivotal role in democracy, its freedom is not absolute. Article 19(1)(a) of the Indian Constitution guarantees the right to freedom of speech and expression, which implicitly includes freedom of the press. However, the state imposes reasonable restrictions under Article 19(2) to ensure that this freedom aligns with public order, morality, and national security. The evolution of media in India, from print to electronic and digital platforms, has expanded the scope of press freedom, empowered citizens and holding authorities accountable. Yet, it has also led to new challenges such as biased reporting, media ownership monopolies, and government interference. Instances of censorship and misuse of outdated colonial-era laws, like sedition, highlight the need for reforms to ensure that press freedom is upheld while maintaining accountability.

A delicate balance between unrestricted freedom and reasonable regulation is essential to prevent media from becoming either a tool of propaganda or an unregulated entity prone to ethical violations. The judiciary has been instrumental in safeguarding press freedom, emphasizing that it is crucial to democracy. However, there has been numerous challenges. To address these challenges, there is a pressing need for independent regulatory bodies free from government or corporate influence. These bodies must possess the authority to impose penalties and enforce ethical standards, ensuring media independence and accountability. At the same time, reforms in media laws and institutions like Prasar Bharati are necessary to protect journalistic freedom from undue political influence. In conclusion, the preservation of press freedom, along with robust regulatory frameworks, is essential to safeguard democracy. Striking the right balance between freedom and accountability will empower the media to act as a responsible and independent pillar of democracy. This would further contribute to an informed and engaged public.

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## CONFLICT OF INTEREST

The authors declare no conflict of interest between them.

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<sup>23</sup> Henaut, D. T. (1971). The Media: Powerful Catalyst for Community Change. *Educational Technology*, 11(7), 27–31. <http://www.jstor.org/stable/44417709>

<sup>24</sup> Karadimitriou, A., von Krogh, T., Ruggiero, C., Biancalana, C., Bomba, M., & Lo, W. H. (2022). Investigative journalism and the watchdog role of news media: Between acute challenges and exceptional counterbalances.