

Current challenges to media freedom in India

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OVERVIEW

Indian Prime Minister Narendra Modi's visit to the United Kingdom in 2015 underlined the existence of growing tensions within the subcontinent. Although the core purpose of his visit was meant to improve bonds between India and the United Kingdom, former UK Prime Minister David Cameron and British journalists, according to the Telegraph, seized the opportunity to ask a few pointed questions (Zhong, 2015). And of course, the matter of freedom of speech was one of the most crucial thereof.

The Constitution protects media freedom in article 19(1) saying, 'all citizens shall have the right (a) to freedom of speech and expression'. Despite this legal provision, India was ranked 133rd out of 180 countries in the 2016 World Press Freedom Index by Reporters without Borders (2016a). We thus find ourselves legitimate to question why a country endowed with a democratic Constitution struggles to enforce its most basic values.

India's legal framework regarding media freedom

To introduce India's legal framework, we will use a top-down approach by starting from the broadest receptacle of Indian laws - the Constitution -, to more specific regulations brought in throughout the 20th century (laws, Acts, amendments, etc.). The Indian Constitution of 1949 only displays one article which grants citizens "freedom of speech and expression": article 19(1). If media outlets are not explicitly referred to, scholars and professionals agreed on taking this value as a common ground for journalists and media experts to express themselves freely (Bhatia, 2014).

Relying on this legal basis, most Indian legislative institutions claim to be deeply committed to freedom of expression in its broader sense. The Indian Supreme Court, for example, made it a duty to uphold freedom of expression whatever threat of violence comes. Leaving threats unpunished would be a sign of weakness and a surrender to

intimidation and violence (Bhan, 2015). Other modern Indian laws opted for a more hybrid stance, advocating collaboration between the media and the government to conciliate freedom of speech and social order.

The Press Council, a statutory body originally created to implement democracy and freedom of speech in India, passed The Press Council Act in 1978 to build a good relationship between the government and the press (Baba, 2014). Equally, a second clause to article 19(1) of the Constitution, aptly called 19(2) seeks to moderate freedom with “reasonable restrictions in the interest of the sovereignty and integrity of India, the security of the state, public order, decency and morality” (Hoveyda et al, 2010, 142). Governmental interventions are thus considered legitimate when it comes to serving the social order. Moreover, independent federal state organs, such as Kerala High Court, also emphasised the necessity to allow freedom of expression - and especially criticism of courts – as long as it remains ascribed to an acceptable judgement and is not assimilated to a direct attack on the judge (Nair, 2004). Finally, more radical legislations aim at criminalizing the excess of speech when the government deems that it clashes with the limitations prescribed by article 19(2).

Worth mentioning are also sections 499, 500, 501 and 502 of India’s penal code which prescribe a two-year jail term for anyone found guilty of defamation “via text, speech, or visuals” (Soni, 2016). In the same fashion, section 66 of Indian Information Technology Act (Ministry of Law and Justice, 2009) extends the sentence to three years of imprisonment and adds social media in the practice of defamatory means (Sharma, 2009). But the most famous example in regard to the condemnation of excessive speech is under the Sedition Law (Narula, 1999), ironically introduced by the British in 1870 (Human Right Watch, 2016). This law is the root of all defamation rules in India, and probably the most radical. It doesn’t only sanction incitement to violence or public disorder, but also disaffection against the government.

India’s legal framework today tends to show that freedom of expression is acceptable to a certain extent, and its limit lies where social order might be endangered. To preserve this

social order, all regulations we have previously scrutinized are ought to comply with both article 19(1) -freedom of speech-, and article 19(2) -reasonable restrictions of freedom.

Therefore, given the situation of freedom of speech in India, our essay will not rely on whether or not journalists in India are allowed to make full use of freedom of speech. Most national laws already made it clear that it is not the case, and clarified how the government is willing to go at great length and limit absolute freedom of speech for the sake of the general good.

However, many questions arise: does the government silence media for the reasons it advocates? Is media censorship systematically applied to preserve the integrity of India, as Article 19(2) stipulates? Is the enforcement of freedom of speech consistent enough to protect journalists from threats, intimidation, and unfair treatments?

India is a sovereign socialist secular democratic republic and it is demonstrated in the preamble of the Constitution of India. To support democratic society, journalism devotes itself to four key standards: accuracy, balance, holding government accountable, separation of news from editorial and advertising (Jones, 2010). The role of journalists is to look at what happens in every corner of the society, gathering information, and delivering them to the public. However, there are several challenges for journalists undertaking their role in India.

Democratic accountability means keeping the government liable. The media traditionally have a watchdog mission, which means scrutinising aspects of power such as business, political power, and the media themselves. The watchdog mission or the scrutinising function are the justification for hard news and investigative reporting, fulfilling the accountability mission (Jones, 2010). However, there have been consistent challenges conducting watchdog mission for journalists in India. In this part, we will look at whether the four functions of journalism work in the real world or not, demonstrating how the journalists in India have intervened in terms of both journalists' personal security and freedom of speech with three categories and examples accordingly.

This is what leads us to showcase how India's legal framework fail to grant journalists and journalism the freedom of speech they are rightfully entitled to benefit from. To do so, we

will then put Indian journalists at the centre of three different threats to their freedom of speech: the army and the police, medias' corruption and the Supreme Court.

THE ROLE OF JOURNALISM AND INDIA'S REALITY

Military forces, Police and Crisis of Journalism

Even the strongest supporter of absolute freedom of speech, Jeremy Bentham, said that there should be exceptions to publicity if it would "favour the projects of an enemy" (Bentham, 2011 [1843], 585). Strong restrictions on freedom of speech in some countries must be applied to maintain national security by military forces. For example, when a story involves national security by covering conflicts between two nations, many of countries worldwide such as Eritrea, North Korea, Saudi Arabia, and China do not allow journalists to cover it. By means of restrictions on journalists' movement and electronic recording and dissemination or monitoring of authorities, the countries prohibit journalists to cover their troubles (Committee to Protect Journalists, 2015a). India is one of these countries.

The military forces are killing journalists' right of free speech to prevent the publication of pieces of information which might clash with their interests. For instance, the presence of journalists in India is prohibited anywhere near the most heavily militarized frontiers in the world, the Line Of Control (LOC) in Kashmir, a border between India and Pakistan without military supervision (Khalil, 2016). The supervision operated by military force is rather misleading: the outcome of such a control is more of an obstacle to freedom of speech than a genuine matter of security. Security guards usually warn journalists about security, claiming that there have been several surgical strikes on the spot. As a distraction, they thus proceed to lead journalists to other locations, where they can appear under a positive light and can boast military bravery. In other words, military forces in Kashmir are in breach of the Indian constitution by showing just what they want to be shown to journalists.

Journalists in India have also been attacked physically several times by government officials, which is also a threat to freedom of expression. According to Witchel (2016), the case of freelance journalist Jagendra Singh is evidence of violence from the police. He died

from burn wounds in June 2015 and it was alleged that police set him on fire at the behest of a local government minister. His work related to the reporting of politics and illegal mining activities in the State of Uttar Pradesh.

Judging by the examples stated above, the government officials such as military power and police, who have an obligation of maintaining law and order in India, are thus thought to abuse their power. Article 19(1) of the Indian Constitution states that “all citizens shall have the right (a) to freedom of speech and expression” but officials ignore it and try to manipulate coverage and disturb journalists carrying out a watchdog mission by monitoring and threatening them in the field. The examples above are evidence of not only the contradiction between the legal framework but also what happens in the real world. The organisations which should serve the law and the public are serving the interests of government power holders, killing freedom of expression and endangering journalists’ safety.

It is a blatant fact when one takes a look at the culture of impunity related to journalist attacks and murders which prevails in India. The Impunity Index ranked India the lowest (13th, 14th, 13th) for the three years in a row (2014-2016). The main suspects of attacking journalists are criminals, political groups, and government officials (Witchel, 2016). Despite Article 19(1), the government limits the right of journalists, especially from performing their watchdog mission in these cases, when the coverage is related to the security of the state and the interests of power holders. In this circumstance, it seems that journalists in India do not have any protection for conducting their watchdog mission not only because of national security issues but also being monitored in the field. They also suffer from political corruption and the numerous attacks led by government officials as we have seen in examples above.

Media Corruption and Crisis of Journalism

Media monopolised by economic bodies in India is another challenge to the media’s watchdog function. According to Jones (2010), one of the medias’ key standards is the separation of news between the editorial and the advertising spheres. In other words, journalists should be free from media ownership. Media ownership matters because it is

derived from the concept of free markets, which is in the capital's interest, not the public's. Moreover, once the capital penetrates the field of media, it also has an impact on media pluralism and diversity, which could end up diminishing different voices of the society (Doyle, 2002). On the contrary, since mass media is one of the main public sources to get information, journalists have an obligation to serve their needs with a wide spectrum of stories. Thus, in this part, we will address how media conglomerates in India disturb freedom of expression by influencing the journalists' performance.

India has several cross-media ownership companies dominating media market. It does not only affect different regions, but it also involves different types of media such as the press, radio, TV and the Internet (Thakurta, 2012). Although India has The Media Ownership Rules, which aim at protecting the cornerstone of democracy, a degree of the plurality of media sources and contents, more economic bodies - even non-media groups -, want to integrate a media company into their business because it is the growing industry (Telecom Regulatory Authority of India, 2008). The Compounded Annual Growth Rate of the Entertainment and Media industry in India is projected to be 17 per cent growth between 2011 and 2016, estimating 21 billion US Dollars revenue. It is the highest expected growth rate among the 15 countries including USA, Japan, China, Germany, UK, France, Italy, Canada, Brazil, South Korea, Australia, Spain, Russia, India, and Netherlands (Telecom Regulatory Authority of India, 2013). These economic bodies' ambition to earn a profit also reach the news.

In 2014, a new media conglomerate, Reliance Industries Ltd (RELI.NS), appeared in India. It took control of the major news media group: Network18 & Investment Ltd (NEFI.NS) (Mahr and Chatterjee, 2014). Three senior editors from NEFI.NS stepped down as the merge, worrying about press freedom. One of them said "every day you can find some example of interference by Reliance – direct interference in news. They give oral instructions. They give hints (Mahr and Chatterjee, 2014)". However, Reliance denied intervention in editorial decisions.

The story of power holders trying to privatize airwaves companies goes back to the 1970s when advertisements were introduced onto the state broadcaster, followed by sponsored programs. The trend intensified in the 1990s when India opened up to transnational media corporations. The ownership of economic bodies made the media chase ratings, and rating-driven TV news in India are now forcing journalists to opt for the safety of the soft news

option (Thussu, 2014). The tactic they adopted was that of the 3Cs in journalism: Cinema, Cricket, and Crime. The 3Cs strategy worked because India has one of the biggest celebrity culture based on Bollywood and the Indian people consider the cricket is the most important sports holding massive popularity cutting across all the classes, languages, and gender.

Thussu (2007) calls this phenomenon 'infotainment' and worried that infotainment in the public is another problem caused by media concentration in India. He gave the case of widespread farmer suicides in rural India throughout a ten-year period between 1993 and 2003. Burcher (2006) highlights that a total of 100,000 farmers have committed suicide in ten years due to the extra cost of gene biotechnology, which arose to be too much to bear. However, the media dazzled by "business tycoons, charismatic and smooth talking CEOs and American or Americanized celebrities" (Thussu, 2007, 111), coverage of massive suicides has been sporadic and scant, at best (Burcher, 2006). The example demonstrates how bad the impact of centralized media companies is on democracy. They mainly ignore the serious coverages of news and give priority to soft and splendid stories. With such a strategy, even if journalists working in the field manage to dig out a the story on power holders and monitor them through their watchdog mission, they are unable to deliver the news because they do not have a window to disseminate the news. In other words, communication means between them and their audience/readership are scarce and narrow.

A well-built separation brings a well-balanced watchdog function in the field of the media. Without this condition, media ownership impacts the news and may eventually control journalism by manipulating the public's sources of information. In line with this notion, the control which economic bodies have over journalism does matter, because it goes against the public needs and diminishes diversity and media pluralism. As Tocqueville (2000 [1835]) argues, media pluralism is important because more newspapers lead to less centralized states. While the right to freedom of expression is legally enshrined in the Indian constitution, a concentrated media ownership seems to be a challenge to editorial independence. Thus, it impacts the media's watchdog mission, which involves monitoring various aspects of power including economic bodies and the media itself to contribute towards diversity within its society.

The judicial system and the crisis of journalism

The third and last threat to journalism in India that we would like to study is the courts' misuse of power. Through two concrete examples, we will show the limits of the Indian legislative forces at both protecting journalism from tyranny and using valuable reasons to prevent journalistic coverage.

The first case we will endeavour to scrutinize is that of Indian journalists being excluded from a gang-rape trial in January 2013. As an article from online magazine PressGazette stated, "the reason given was that the courtroom was too full and that there might be a risk to the safety of the accused men" (Turvill, 2013). If it is needless to explain that the size of a courtroom is nowhere stated in the Constitution as a reason to limit freedom of speech, the Court's referral to the safety of the accused men in this case is equally dubious. The vagueness of the word 'safety' makes the Indian Court's language rather evasive, which it has often been accused of (Godbole, 2003). Indeed, this said safety, although firmly asserted by the Court, doesn't concur with the provisions of Article 19(2). The latter aims at preserving "the interest of the sovereignty and integrity of India, the security of the state, public order, decency and morality" (Hoveyda et al, 2010, 142).

However, it is hardly presumable that reporters jeopardized public order and morality: public backlash broke out before the trial took place, and journalists were denied the right to eye-witness the court case without having written anything about it. The Court thus went beyond its Constitutional authority of censoring freedom of speech, as it literally hindered journalists from performing their duty. In other words, the speech was not subjected to Article 19(2)'s restrictions: it was namely made impossible. Moreover, unlike what it claims, this partially justified suspension of freedom of speech may actually not lead to public order, on the contrary. Public accountability - keeping people informed about decisions made by the powerful -, is crucial to make people trust the good faith of Indian institutions (Boven and Schillemans, 2014). Failing to uphold this popular trust by silencing journalists can be detrimental to maintain Article 19(2)'s social order, as what people mostly wanted after this incident was justice ... and truth. Therefore, journalism in India finds itself facing a new threat to fight and an updated watchdog function: monitoring the miscarriages of justice - the Supreme Court in this case-, and hereby reinforce its effectiveness (Poyser, 2012).

A second case is also telling of the Courts' shortcomings at giving shelter to journalists who are unlawfully tyrannized by other institutions. Indian journalist Somaru Nag was covering rural issues when he got arrested by policemen for allegedly being a Maoist sympathizer (Committee to Protect Journalists, 2015b). He was then kept in jail and beaten for almost a year before being granted a fair trial and eventually released. This case does not only show the police's abuse of power and how dangerous it is not to comply with the 3Cs tactic mentioned earlier. More than anything else, it highlights the dramatic amount of time the Court takes to deal with controversies related to freedom of speech. This idea is widely emphasized by international NGO Transparency International, which stated that delays in the disposal of cases is one of the pillars of judicial corruption in India (Hussain, 2012, 4). This lack of reactivity when journalists come under physical and mental attack contributes to shattering the statue of journalism in India. Besides, it truly affects freedom of speech prescribed by the very same Supreme Court as we've seen in our legal framework, to whom violence would be tantamount to negation of the rule of law and a surrender to blackmail and intimidation (Bhan, 2015). And yet, this situation demonstrates that the voice of journalism was utterly shut down at the expense of Article 19(1).

But the Supreme Court is not only slow, the way it deals with judicial cases is also described by many scholars as "complicated", "backlogged" and "understaffed" (Yadav, 2014, 77). Such a detachment and absence of determination vis-à-vis the public interest appears quite paradoxical for a legislative body that claims to be the main purveyor of democracy in the country. Jain (2014) explains this apathy by pointing out how unfaithful the Indian Court is to the nation. Freedom of speech is not prioritized and efficiently protected by the Indian Supreme Court.

CONCLUSION

We conclude that even though India has a constitutional statement valuing freedom of speech and expression, it is barely protected in reality.

Although India has an action body called the Press Council of India and specific regulations, it seems that the country needs more detailed law regarding the medias to protect not only the freedom of expression and speech but also journalists' safety.

So how could India move further towards more freedom? As mentioned in our Overview part, India was ranked 133rd out of 180 countries in the media freedom index in 2016, while Finland keeps the first place for two consecutive years according to Reporters Without Borders (2016a). The reason why Finland took the first place is because this nation meets all standards imposed by the World Press Freedom Index. The Chairperson of Finland's Council for Mass Media (CMM) Elina Grundström explained that "long-standing Finnish legislation supports the freedom of the press by promoting transparency" (Weaver, 2016). Finnish Communications Regulatory Authority has detailed regulations dealing with the Internet, cyber security, telephone, post, TV, and radio. Moreover, they publish every details and updated news on their website to let the public know about their deeds and actions. Such efforts from the authorities are the core of Finland's press freedom. This report thus suggests that Indian law makers should follow Finland's method to keep a certain transparency of the information flow and a better quality of legal frameworks. But more than anything else, we may conclude that India would become a better country regarding press freedom if India takes on improving the overall standards set up by the World Press Freedom Index: a stronger independence and pluralism of the media, a more transparent flow of information, more coherent legal frameworks vis-à-vis the application of the rule of law, and the safety and freedom of journalists (Reporters Without Borders, 2016b).

However, India showed significant progress on Internet access and freedom in 2014. According to Varshney, Kumar, Sapre and Varshney (2014), the figure for Internet usage in India records 31 per cent growth during 2013. Overall Internet usage is expected to continue, due to the changes in users' habits and increasing sales of smartphones in India. This is a rather significant phenomenon, because the Internet has the potential to improve the quality of journalism, and it seems that India made a breakthrough in press freedom thanks to the democratization of Internet access.

In a democratic country, news should be based on what the people need to know (Zittrain, 2010), not on what the public wants to know. Since the Internet can be regarded as a

limitless window in comparison to newspapers (limited in space), or to TV and radio (limited in time), journalists now have access to a larger set of means to express themselves. The users choose what to read in the Internet news stand. Therefore, we can conclude this report by adding that if India keeps trying to open up Internet access, freedom of speech as enshrined in article 19(1) of the Constitution (Ministry of Law and Justice, 2015) would be implemented more effectively than in the past.

References

Baba, J. (2014). Press Commission and Press Council of India, *wecommunication*, [Online], Available at: <http://wecommunication.blogspot.fr/2014/09/press-commission-and-press-council-of.html>

[Accessed: 16th December 2016]

Bentham, J. (2011 [1843]), *Jeremy Bentham, The Works of Jeremy Bentham, vol. 2.*, Online library of liberty. [Online] Available at: <http://oll.libertyfund.org/titles/bentham-the-works-of-jeremy-bentham-vol-2>

[Accessed: 28th November 2016]

Bhan, I. (2015), *Legal Eagles: Stories of The Top Seven Indian Lawyers*, New York : Random House.

Bhatia, G. (2014), Free Speech and Source Protection for Journalists, *The Centre for Internet and Society*, [Online], Available at: <http://cis-india.org/internet-governance/blog/free-speech-and-source-protection-for-journalists>

[Accessed: 21st December 2016]

Boven, M. and Schillemans, T. (2014) *The Oxford Handbook of Public Accountability*, Oxford: Oxford University Press.

Burcher, S. (2006), Stem Farmers' Suicides with Organic Farming, *Science in Society Archive*, [Online] Available at: <http://www.i-sis.org.uk/farmersuicides.php>

[Accessed: 8th December 2016]

Committee to Protect Journalists (2015a), 10 Most Censored Countries, *Attacks on the Press*. [Online] Available at: <https://www.cpj.org/2015/04/10-most-censored-countries.php>

[Accessed: 28th November 2016]

Committee to Protect Journalists (2015b), Journalist covering sensitive rural issues in India jailed, *Committee to Protect Journalists*. [Online] Available at: <https://cpj.org/2015/12/journalist-covering-sensitive-rural-issues-in-indi.php>

[Accessed: 18th December 2016]

Doyle, G. (2002), *Media ownership : the economics and politics of convergence and concentration in the UK and European media*. London; Thousand Oaks Calif.

Godbole, M. (2003) *Public Accountability and Transparency: The Imperatives of Good Governance*, New Delhi : Orient Longman. Heehs, P. (1988), *India's freedom struggle, 1857-1947: A short history*, Oxford : Oxford University Press

Hoveyda, A., Kumar R. and Alam M. (2010), *Indian Government and Politics, 1st edition*, London : Pearson Education.

Human Rights Watch (2016), *Stifling Dissent, Human Rights Watch*, [Online] Available from:

<https://www.hrw.org/report/2016/05/24/stifling-dissent/criminalization-peaceful-expression-india>

[Accessed: 13th December 2016]

Hussain, Y. (2012) *Corruption Free India: Fight To Finish*, New Delhi : Epitome Books

Jain, M-P. (2014) *Indian Legal History 2006*, Raleigh: Lulu Press.

Jones, A. S. (2010), *Losing the news : the uncertain future of the news that feeds democracy*. New York; Oxford: Oxford University Press.

Khalil, S (2016), Kashmir conflict: Tension on the India Pakistan border, *BBC*, [Online] Available at:

<http://www.bbc.co.uk/news/world-asia-37531900>

[Accessed: 28th November 2016]

Mahr, K and Chatterjee, S (2014), Indian media fret as conglomerate buys up major news channel, *Reuters*, [Online] Available at: <http://in.reuters.com/article/india-media-idINKBN0G301920140803>

[Accessed: 5th December 2016]

Ministry of Law and Justice (2009), The Information Technology (Amendment) Act, 2009, No.10 of 2009, New Delhi: Government of India Ministry of Law and Justice. [Online] Available at:

http://meity.gov.in/sites/upload_files/dit/files/downloads/itact2000/it_amendment_act2008.pdf

[Accessed: 13th December 2016]

Nair, K. (2004), *Law of Contempt of Court in India*, London: Atlantic Books.

Narula, S. (1999), *Broken People: Caste Violence Against India's "untouchables"*, 1st edition, New York : Human Rights Watch.

Poyser, S (2012), *Watchdogs of the Wrongly Convicted : The Role of The Media in Revealing Miscarriages of Justice*, University of Portsmouth. [Online] Available at:

http://eprints.port.ac.uk/12138/1/JUNE_POST_VIVA2_Latest_Changes_to_FINAL_PHD_THESIS_FOR_SUBMISSION_FEB_2013_from_JUNE_2012.pdf

[Accessed: 2nd January 2017]

Reporters Without Borders (2016a), 2016 World Press Freedom Index, *Reporters Without Borders*, [Online] Available at: <https://rsf.org/en/ranking>

[Accessed: 2nd January 2017]

Reporters Without Borders (2016b), The World Press Freedom Index, *Reporters Without Borders*, [Online] Available at: <https://rsf.org/en/world-press-freedom-index>

[Accessed: 7th January 2017]

Sharma, D. (2009), *Foundations of IT*, New Delhi : Excell Books.

Soni, A. (2016), In India, online campaign seeks to free press from risk of criminal defamation, *Committee to protect Journalists*, [Online] Available at: <https://cpj.org/blog/2016/10/in-india-online-campaign-seeks-to-free-press-from-.php>

[Accessed: 21st December 2016]

Telecom Regulatory Authority of India (2008), *Consultation Paper on Media Ownership*, New Delhi: Telecom Regulatory Authority of India. [Online] Available at: <http://www.trai.gov.in/WriteReadData/ConsultationPaper/Document/cpaper23sep08no13.pdf>

[Accessed: 2nd January 2017]

Telecom Regulatory Authority of India (2013), *Consultation Paper on Issues relating to Media Ownership*, New Delhi: Telecom Regulatory Authority of India. [Online] Available at: http://www.trai.gov.in/WriteReadData/ConsultationPaper/Document/CP_on_Cross_media_%2015-02-2013.pdf

[Accessed: 7th December 2016]

Thakurta, P. G. (2012), Media Ownership in India-An Overview, *Hoot*, [Online] Available at: <http://www.thehoot.org/resources/media-ownership/media-ownership-in-india-an-overview-6048>

[Accessed: 2nd January 2017]

Thussu, D. K. (2007), *News as Entertainment: The Rise of Global Infortainment*. London; Sage.

Thussu, D. K. (2014), 'Television News and an Indian Infotainment Sphere' in Biswarup Sen and Abhijit Roy, eds., *Channeling Cultures: Television Studies from India*, ed. Oxford Scholarship Online, 130-148.

Tocqueville, A. de, (2000 [1835]), *Democracy in America. Volumes I and II*. New York: New American Library.

Turvill, W. (2013), Journalists excluded from Indian gang-rape, *PressGazett*, [Online] Available at: <http://www.pressgazette.co.uk/journalists-excluded-indian-gang-rape-trial/>

[Accessed: 13th December 2016]

Varshney, B., Kumar, P., Sapre, V. and Varshney, S. (2014), 'Demographic profile of the Internet-using population of India', *Management and Labour Studies*, Vol.39(4), 423-437.

Weaver, F. (2016), Finland top-rated for press freedom, *this is FINLAND*, [Online] Available at: <https://finland.fi/life-society/finland-top-rated-for-press-freedom/>

[Accessed: 7th January 2017]

Witchel, E. (2016), Getting Away With Murder, *Committee to Protect Journalists*. [Online] Available at: <https://www.cpj.org/reports/2016/10/impunity-index-getting-away-with-murder-killed-justice.php>

[Accessed: 28th November 2016]

Yadav, S. (2014), *Culture of Corruption in India*, 1st Edition, New Delhi : Orient Waterman.

Zhong, R. (2015), "How Modi Dealt With Pointed Questions From the British Press", *The Wall Street Journal*, [Online], Available at: <http://blogs.wsj.com/indiarealtime/2015/11/13/how-modi-dealt-with-pointed-questions-from-the-british-press/>

[Accessed: 21st December 2016]

Zittrain, J. (2010), 'The Internet and Press Freedom', *Harvard Civil Rights-Civil Liberties Law Review*, Vol.45, 563-576.