

AN ACCOUNT ON THE FREEDOM OF PRESS IN INDIA

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ABSTRACT

This paper explores the importance of freedom of press, the threats faced by the journalists and the deteriorating state of the freedom of press today. The objectives of the study are: to emphasize on the necessity of the freedom of press and to bring attention to the deteriorating situations of journalists when they report on politics, corruption or crime. Qualitative analysis is consumed as the methodology and content analysis is employed for engendering the findings. The results from further detailed analysis imply the deteriorating freedom of press where freedom is often compromised and even the lives of the journalists are at stake to carry forth ethical reporting. The study points out the need for journalists to exercise complete freedom of press which helps in the reduction of the corruption in the country. Since the public still believes on media and consider that they provide truth to them, it is of utmost importance to uphold and practice freedom of press in a democratic country like India.

Keywords: *democracy, freedom house, freedom of press, reporters without borders, world press freedom index.*

1. INTRODUCTION

“A free press is not a luxury. A free press is at the absolute core of equitable development, because if you cannot enfranchise poor people, if they do not have a right to expression, if there is no searchlight on corruption and inequitable practices, you cannot build the public consensus needed to bring about change”-James D. Wolfensen, the former president of World Bank (Pippa Norris, 2006).

In the current scenario, there are many journalists who are being killed because of their work like Jamal Khashoggi, an Arabian journalist and Gauri Lankesh, journalist from Bangalore, India. Though the study has been done on the freedom of press yet it changes with time which makes it relevant to concern on this topic.

1.1. Origin of Freedom of Press

1.1.1. Areopagitica: John Milton in 1644 through his pamphlet Areopagitica, argued for the press freedom in response to the British Passage of law requiring for the approval of all books prior to publication (John Cunningham, n.d.). It argued that there is need of freedom of speech for the society to speak freely and share information without any fear from the government as they take away the ability to think (John Milton, 1644). Liberal theorists from Milton to John Stuart Mill have argued the essentiality of the free press for the democracy.

1.1.2. The world's first press law: It was passed by Swedish parliament on December 2, 1766 that supported the freedom of press and information and became the Freedom of the Press Act after 25 years (John Cunningham, n.d.). The framers of the U.S. Constitution enriched the same principles in the document's First

Amendment. It is an enumerated right in Universal Declaration of Human Rights, making it common command for many of the countries.

1.1.3. Universal Declaration of the Human Rights: Article 19 of Universal Declaration of Human Rights gives the press freedom and right to access information, meaning ‘the freedom to express without any illegitimate restriction and without any political or commercial interference’ (UNESCO, 2018). The press freedom allows the journalists to report freely without any restriction from government or any harmful attack on them especially in investigative reporting and maintaining transparency between government and public (Marina Guseva et al., 2008).

1.1.4. International Programme for the Development of Communication: The UN started this programme promoting and developing the media freedom and for sustainable development. There is ‘Guillermo Cano World Press Freedom Prize’, created in 1997 in the name of Guillermo Cano, honors the organization for the contribution and defense of press freedom (UNESCO, 2015).

1.2. Freedom of press in India and Reasonable restrictions

Raja Ram Mohan Roy is known as the pioneer of the press freedom in India and ‘Indian Areopagitica’ is credited to him in 19th century. In 1823, Press Ordinance was propagated in India which says that there cannot be any publication of newspapers and periodicals without the license from Governor-General-in-Council and he was against this concept. He submitted memorandum to the Supreme Court for the freedom of press and wanted to have stronger public opinion (Arun Behera, 2012).

1.2.1. Reasonable restrictions: The concept of freedom of press is included in Article 19(1)(a) of the Indian Constitution with certain restrictions in Article 19(2) of the Indian Constitution such as: Sovereignty and integrity of India, Security of the State, Friendly relations with Foreign States, Public order, Democracy or Morality, Contempt of court. (Mayukh Gupta, n.d.).

1.2.2. Freedom of the Press Day: ‘World Press Freedom Day’ is celebrated on 3rd May since UN General Assembly started in 1993. This day celebrates the fundamental principles of press freedom and assesses the state of press freedom throughout the world. It also gives opportunity to defend the media from attacks on their independence and pay tribute to the journalists, who lost their lives while performing their duty (UNESCO, n.d.).

1.3. Role of freedom of press

Amartya Sen suggests that the free press is the voice for the poor people and generates more informed choices about the economic needs. A liberal press is recognized as strengthening of democratization and good governance directly as well as human development indirectly (Pippa Norris, 2006, p. 10).

A free press also helps the public in political decision making as they are educated of the ongoing things in the world (Marina Guseva et al., 2008).

1.4. Right to Information Act and Media

Right to Information Act (RTI-2005) allows the public and media to practice the freedom of speech and expression by accessing the information. They can ask government for the information and they have to reply within

30 days. This helps journalists to maintain transparency between the government and public by analyzing the government with the factual, current and primary information (Legal Junction, 2011).

Due to RTI-2005, there were journalists killed and arrested who were covering Vyapam Scam, where government officials were illegally passing students in Madhya Pradesh Professional Examination Board in 2007 (Jayant Sriram, 2016).

1.5. Journalism Organizations

There are several organizations that safeguard the journalists and promote the freedom of press like *International Federation of Journalists, Reporters without Borders and Freedom House*.

1.5.1. International Federation of Journalists: known as global voice of journalists by supporting and fighting for them. It was established in 1926 and has 6 lakh media professionals in more than 140 countries. It has International Safety Fund that provides humanitarian fund to journalists in need. However, it promotes the collective actions to defend human rights, democracy and media pluralism (International Federation of Journalists, n.d.).

1.5.2. Reporters without Borders: also known as *Reporters Sans Frontiers* (RSF) founded in 1985 by four journalists. An independent organization that promotes the press freedom and records the journalists killed because of their work. This helped in reducing the torturing towards the journalists as they reported on the shady practices on the journalists by government. The RSF started to publish an annual report in 2002 provide called *World Press Freedom Index* and assess the freedom of journalists in 180 countries and regions (Reporters without Borders, n.d.)

1.5.3. Freedom House: The first independent American organization founded in 1941 for the freedom and democracy around the world. It acts as a catalyst for greater political rights and civil liberties through a combination of analysis, advocacy, and action. They started to publish an annual report called *Freedom of the press* in 1980. It assesses the degree of print, broadcast and digital media freedom (Freedom House, n.d.).

1.5.4. UNESCO: it works directly and indirectly with the media organizations and press freedom advocacy groups. It has also been asked to assist, together with the other United Nation system organizations and also helping in the promotion of freedom of press and development of newspaper community (UNESCO, 2006).

1.5.5. Committee to Protect Journalists (CPJ): A non-profit organization promoting freedom and fighting for the journalists. CPJ is made up of about 40 experts around the world, with headquarters in New York City. CPJ has a network with which they take action in regards to the violation of press. It publishes an annual worldwide survey of the press freedom, which is when the journalists are attacked due to work, called *Attack on the Press* (Committee to protect journalists, n.d.)

1.6. Significance of the study

The dissertation emphasis on how the right to freedom of press is taken away from journalists, especially when they report on the politics, corruption or politics. It also includes what can be the possible solutions for this problem.

1.7. Objective

- 1.7.1 To emphasize on the necessity of security and freedom for journalists.
- 1.7.2. To bring attention to the deteriorating situations of journalists in the country.
- 1.7.3. To bring limelight on journalists, those who speak truth about corruption or politics.
- 1.7.4. To bring the right to protect journalists from threat and enables them to collect information and express their views.
- 1.7.5. To focus on the threats faced by the journalists on their reporting.
- 1.7.6. The most famous cases where journalists were killed.

1.8. Hypothesis

- 1.8.1. There is no freedom and security for journalists.
- 1.8.2. There is deterioration in the situation of freedom of journalists in India.
- 1.8.3. There are threats faced by journalists that risk their life.
- 1.8.4. Laws pertaining to the press freedom are flimsy

2. REVIEW OF LITERATURE

2.1. Global Press Freedom

2.1.1.Freedom House (2017) in the *Freedom of the Press 2017* examines the condition of press in different countries. The report assesses the degree of media freedom in 199 countries and territories, analyzing the events and developments of each calendar year. Each country and territory receives a numerical score from 0 (the most free) to 100 (the least free), which serves as the basis for a status designation of 'Free, Partly Free, or Not Free'. According to this report, freedom of the press has deteriorated in the last 13 years and has become the lowest. There is only 13 % of the world's population that enjoys the free press meaning fewer than one in seven people live in countries where coverage of political news is robust, the safety of journalists is guaranteed, state intrusion in media affairs is minimal, and the press is not subject to onerous legal or economic pressures (Freedom House, 2017).

2.1.2. UNESCO and University of Oxford (2018) in *World Trends in Freedom of Expression and Media Development* portrays a world whose meteoric changes deeply affect societies, especially in the areas of freedom of expression and media development. The study through the content analysis examines the four key elements which are media freedom, media pluralism, media independence and safety of journalists (UNESCO and University of Oxford, 2018).

2.1.3.Sarah Elliott, Mona Elbahtimy and Sharath Srinivasan (2012) in *Threats to the Right to Life of Journalists* study the safety of journalists. The authors through the content analysis focus on the threats faced by the journalists and reasons behind it and how legal and non-legal frameworks can protect the journalists.

2.1.4.Justine Limpitlaw (2012) in *the role of the media and press freedom in the society of media law handbook for South Africa* deals with importance of the press freedom in the society. The author explores why the freedom of speech and expression is necessary in democratic society and the role of media.

2.1.5. Ulla Carlsson and Reeta Pöyhtäri (2017) in *Assault to Journalism* explores about the safety of journalists and how it is harmed by the country. The main concern is that there is need of safety of journalists to perform journalism. The authors say that freedom of expression is the right of every citizen and also for the journalists for the democratic country. They give us a detailed account of journalists killed and the reasons behind it such as harassment, attack or assault. Citing Smyth (2012) the authors states that (Ulla Carlsson, 2017, p.249) there should be financial consumption and protection paid for by the media organization for the freelancers so that they can afford their medical health and disability while they are reporting.

2.2. Press Freedom in India

2.2.1. Zafreena Begum (2013) in her *Press freedom in India: Legal Study* explores how the press started and why it is needed in the country. The author through content analysis states that freedom means no restrictions and ‘freedom of press’ is the right to print and publish without any interference of state. Freedom of press is essential for the democracy of the country and it is regarded as “the mother of all other liberties in the democratic world”. She discusses on the beginning of the struggle for freedom in India, its legal background, reasonable restriction and provides recommendation for freedom of the press.

2.2.2. *Threats to Journalists in India: Journalism in the Age of Intolerance and Rising Nationalism* (Furquan Ameen Siddiqui, 2017) analyzes how it has become difficult for the journalists to report in the country. The author through the survey highlights the picture of the journalists being killed because of the work. Referring to Committee to Protect Journalists, he states that there are 75 journalists which are killed since 1992 to 2017. The stories about politics and corruption are the fatal consequences. According to Geeta Seshu, “the current political environment, irrespective of the party in power, is responsible for the impunity with which these attacks take place” (cited in Siddiqui, 2017, p.14). Gauri Lankesh, a famous journalist, in her writing criticizes the right wing Hindu nationalist and due to which they killed her in 2017. Narendra Yadav, Jagendra Singh, Samiuddin Neelu, Rajdev Ranjan, Karun Misra, are a few names of journalists who have either been a first-hand witness to threats or were killed for investigating and writing about corruption on topics ranging from the state machinery, police officials to mining, gambling and religion. The author recommends that the Press Council, an independent body for the journalists, should help the journalists and strengthen the press association in the country. There should be law to protect the journalists whenever they are reporting.

2.2.3. *Press Freedom in India after Independence* (Pramiti Ray, 2015) analyzes how the freedom of press has evolved after the independence and till the present and also highlights the restriction upon the freedom of press from time to time. Unlike the U.S. constitution, the Indian Constitution doesn’t have any separate freedom of press. But, it is included in the Article 19(1)(a) of the Indian Constitution to protect the rights of freedom of press. The author recommends that the circulation of the newspaper should be properly maintained. Careful watch should also be kept on the possibility of their indulging in monopolistic and unfair trade practices. It also recommends that press should be responsible in their reporting as they should see what news to be prioritize at the time of reporting.

2.2.4.S Saleel Indraneel (2016) in his paper *the role and accountability of the media in the Indian democracy* deals with the history and the role of the freedom of the press in the democratic world, what is the scope of the power of press and historical aspect of the press. The press is the fourth pillar of democracy that checks on the policies of the government and also informs the society about it. The press is also responsible for circulating the information to public which is important to have the right of freedom of expression. The freedom of press is not because of any legal sanction but it is there from the birth of human being.

2.3. Media freedom and corruption

2.3.1.Umeer Abbas Mela (2009) in *free press: an instrumental weapon in the fight against corruption* deals with the in-depth relation of the free press and reduction of the corruption in the country. There is a link between the corruption and freedom of press as free press lowers the corruption level in the country by exposing the truth to the world. This should lead to greater transparency and a watchful eye of state actions. There is a statistically significant correlation between press freedom and corruption, controlling for income levels, inequality, population, and human capital.

2.3.2.Masudul Biswas (2009) in *media freedom, governance and civil society* studies the influence of media freedom in the civil society and how it affects the governance of the society and also sees that democratic country also influence the media freedom in the country. The existence of active civil society and control corrupt goes parallel to the freedom of press. Konitzer- Smirnov (cited in Biswas, 2009, p.5) states that civil society and free media complement each other in attaining their goals of civil rights and democratic society. The civil society being independent can significantly influence the media freedom in the different regions of the liberty. The author recommends for a better independent organization which free from government and any political interference.

2.3.3.Piero Stanig (2009) in the essay *on Political corruption and Media Freedom* focuses on the role of the media in the provision of information that citizens can use to monitor the behavior of politicians and bureaucrats. The author states that the politicians affect the reporting of the media and exploits the freedom of speech of the journalists. The politician that doesn't want the media to publish any information regarding them in the newspapers can get a legal sanction from the court and later handled by the court. The preference of the publishers might be influenced through the politician in regards to what news has to be published so that there is no sensitive information regarding the politician that can affect their reputation. The author recommends a better place for the journalists to perform their practice in the country without any interference from the politicians as they disturb the access of flow of information.

2.3.4.Amanollah Tamandehrou (2014) in *Freedom of press in a democratic society- the case of India* analyzes the freedom of the press in India and the threats that are faced by the journalists when they are performing their duty. Independent reporting by journalists leads to attack on them like arrest, murder, fine, imprisonment or even kidnapping by the government or any high authority. The journalist of a newspaper is implicated by the police authority or any higher authority to fabricate his critical writing and raids in the newspaper office by unruly mobs are intended to interfere in the freedom of press. Seizure of the camera by police and not allowing the journalist to

do his function is also intended to interfere in the freedom of press. Freedom speech and expression is threatened by direct physical attacks from both security forces and terrorist group.

3. METHODOLOGY

The method used for this dissertation is content analysis which is a potentially one of the most important research techniques in the social sciences. A detailed analysis will be conducted based on the content from different articles and research papers.

4. DATA ANALYSIS

This section will analyze the existing literature pertaining to freedom of press in detail thematically and try to solve the problems raised in this study.

We have discussed that freedom of expression is the fundamental right of human being which contains the freedom of press which is practiced by the journalists. This is necessary for a democratic world so that journalists can give the truth to the country. It is considered to be the fourth pillar of the democracy. Maintaining the freedom is the responsibility of the state, court, media companies, and journalist organizations. However, there have been several cases where the journalists are being killed when they reveal the sensitive information and reason is the lack of security which also leads to the corruption in the country. The journalists are unable to raise their voice because of the threats and they are being silenced by the politicians or police to not to reveal their truth. Therefore, there is need of many efforts from human rights, media development and media literacy to protect the freedom of press.

4.1. Freedom of the press: A myth or reality?

4.1.1. Global

According to the *Reporters without Borders* (2017), *World Press Freedom Index 2016*, Finland was on the top with the freedom of press for five consecutive years and Eritrea was ranked as last with 'no freedom'. There have been 11 journalists who are being detained without any legal proceedings. However, Eritrea in 2017 had some betterment in the freedom of press and reached to 179th ranking out of 180 countries.

Norway maintained 1st ranked in 2018 (*World Press freedom index 2018*). The journalists and media face violence rarely in Norway, although some have been threatened by Islamist fundamentals in recent years. North Korea ranked at 180th out of 180 countries because it is totalitarian regime keeps its citizens in a state of ignorance.

According to *Reporters without Borders* (2018), the journalist killed due to their work is increased by 8 % to 80 and professional journalists killed are increased by 15 % making it to 63 in 2018. Afghanistan was the world's deadliest country for the journalists in 2018 with 15 being killed and followed by Syria with 11. Mexico was the deadliest country outside a conflict zone with nine journalists being killed.

According to *Reporters without Borders* (2019), there are three Ugandan journalists working for Ugandan TV channel *NBS* were arrested while investigating the suspected theft of drugs by government employees.

According to *Committee to Protect Journalists* (CPJ), the political groups and government parties are the dominant suspect for killing 627 journalists between 1992 and 2011. Many of journalists were killed by the

Government when they reported on anti-government protest during Arab Spring in 2011 in Yemen, Egypt and Tunisia.

4.1.2. India

According to *Reporters without Borders* (2016), India was ranked at 133th out of 180 countries and in 2018 dropped to 138th. Gauri Lankesh, a Bangalore based activist and three other journalists were killed for their professional work in March 2018. Kashmiri journalists working for the local media outlets are often the target of violence by the soldiers. Shujaat Bhukari, the editor of newspaper *Rising Kashmir*, was shot dead on June 14, 2018 due to his work. There has been increase in the police attacks and violence by armed forces and politic activists in Jammu and Kashmir. Sandeep Sharma who was investigating on the illegal sand mining was crushed to death in Madhya Pradesh on March 26, 2018. On June 22, 2018, Satyendra Gangwar was shot and wounded by mining mafia, which he was investigating (Reporters without Border, 2018).

The threats are not only for men journalists but also for women journalists because of their work. When the Sabarimala temple in Kerala was opened in October, 2018 after supreme court lifted the ban for entry of women of all age group, women journalists who tried to enter temple and cover news of the pilgrimage were attacked by the Hindu fundamentalist protesters. *Republic TV* reporter Pooja Prasanna's car was attacked by an enraged crowd in a pilgrimage route to temple and later Mausami Singh was dragged and repeatedly slapped (Reporters without Border, 2018).

4.2. Threats faced by journalists

The larger numbers of journalists that are killed are out of the war zone and are in the peaceful place. There are two types of threats that journalists face: direct and indirect.

Direct threats involve communication without any intermediaries, usually through text messages, calls or electronic mails. While indirect threats involve the militants warning reporters about their work. This is for the journalists to sense the danger while reporting (Carlsson and Reeta Poyhtari, 2017). The threats the journalist deals with are death threats over communication or meeting in person which risk their life. The attacks also include kidnapping, enforced disappearances, arbitrary detention and torture, and also restricting the exercise of freedom and access to information.

The advent of digital platforms has given opportunities to practice the freedom of expression and practice journalism. However, they face threats through e-mails or threatening them on their posts whenever they report on politics, corruption or crimes. There are harassments including public shaming, cyber bullying, trolling or cyber stalking (UNESCO and University of Oxford, 2018).

4.2.1. Jamal Khashoggi: A well-known Saudi journalist and critic of Saudi government working for Wall Street Journal, was killed on October 2, 2018. He went to Saudi consulate in Istanbul and didn't return from the Saudi consulate. Saudi government remained silent for two weeks and later told that he left the place within few minutes or an hour. Saudi Arabia has detained 21 Saudi nationals and dismissed two senior officials (BBC, 2018).

4.2.2. Daniel Pearl, the famous reporter of The Wall Street Journal, was killed in Karachi, Pakistan during 23rd January and February 21st, 2002 after the 9/11 attack. He was last seen on his way to an interview at the Village Restaurant. He reported on the 'war on terrorism' and was retracing the steps of "shoe bomber" (Committee to Protect Journalists, 2002).

4.2.3. Gauri Lankesh was a well-known writer and editor for her fearless and outspoken acts. She was known for her secularist criticism of right wing and Hindu nationalist, including the BJP leaders. She was shot dead on 5th September, 2017. There were several protests against her killing in many of the Indian cities, including the capital Delhi. She was also convicted and jailed for six months because of the report she published on the BJP leader (BBC, 2017).

4.2.4. Jagendra Singh, apopular journalist in the Uttar Pradesh state, known for reporting on the wrongdoings and corruption done by the government in the state. He was burnt to death by the minister accompanied by the police officials because of his work in 2015. He reported about the state minister, Ram Murti Singh Verma, and some officials who did wrong. Therefore, the officials claimed that he will be burnt if he reports against them (Committee to Protect Journalist, 2015).

4.3. Deterioration in the freedom of press

Freedom of the Press 2014 shows the decline in the press freedom from 2009 to 2013 by 0.47 point. The press freedom is at lowest in 2013 since 1996, when Freedom House began incorporating population data into the findings of the report. There was 14% of the population that had freedom. This record was obtained by analyzing the freedom in 197 countries and territories (Freedom House, 2014).

There was decline to 13% in the *Freedom of the Press 2017* with a total of 61 (31 %) were rated 'free', 72 (36 %) were rated 'partly free', and 66 (33 %) were rated 'not free'. This was analyzed with freedom in 199 countries and territories. There were some changes that were marked: Afghanistan improved from 'Not Free' to 'Partly Free', the Maldives declined from 'Partly Free' to 'Not Free', and Poland declined from 'Free' to 'Partly Free' (Freedom House, 2017).

According to *Reporters without Borders* (2018), India was ranked 138th out of 180 countries in the *World Press Freedom Index 2018*. The rank is decreasing year by year like in 2016 it was 133th and in 2017 it was 136th. This indicates that the freedom of press is decreasing which means no freedom for the journalists and increase in the threats for them.

5. CONCLUSION

The safety of journalists is still a major concern across all the regions and there has been increase in the killings of journalists. At the same time there has been increase in the abduction, torture and harassment of the journalists with more for women journalists in online harassment (UNESCO and University of Oxford, 2018).

The meaning that the freedom of press exists is that it is there within the brackets of restrictions (Amanollah Tamandehrou, 2014). But from the above analysis we observed that there are always restrictions. Murders of journalists engaged in reporting of crime and politics is usually in the non-conflict area. Depending on

the beat they cover, different challenges are thrown at them. Politicians, police, corporate houses, police, businessman or mafia are threat for the journalists.

To safeguard the journalists there ought to be wider institutional and legitimate systems must be heartily implemented and brought into play if columnists later on, just as those on hazardous assignments in the present, are to be appropriately perceived and protected in universal law, varying levels of administration and inside common society.

5.1. Proving Hypothesis

5.1.1. H1: There is no freedom and security for the journalists

Through the content analysis of the data, it can be proved that there is no freedom and safety for the journalists, especially in the terms of politics, crime or corruption (refer to 4.2). The examples of the journalists are Shujaat Bhukari, (editor of *Rising Kashmir*-shot dead on June 14, 2018), Sandeep Sharma (investigating on the illegal sand mining in Madhya Pradesh-death on March 26, 2018). On June 22, 2018, Satyendra Gangwar was shot and wounded by mining mafia, which he was investigating. Suman Debnath was almost killed when two men tried to slit his throat because he was investigating on the theft of petroleum in Tripura state. Since 1992, the time when Committee to Protect Journalists started to report there have been 27 journalists that are killed for their work. More than half of them are killed because of their reporting on the corruption. Justice system and lack of media adds more threats to the India's press.

The scenario shows that the journalists don't have the freedom to report and if they do so there is no safety for them.

5.1.2. H2: Deterioration in the situation of journalists in the country.

The journalists losing their life due to the work are deteriorating their situation which is no freedom for them to report (refer to 4.3). The *Freedom of the Press 2017* shows that there was thirteen percent of the population that enjoys the freedom which is freedom of the coverage of political news is robust, the safety of journalists is guaranteed, state intrusion in media affairs is minimal, and the press is not subject to onerous legal or economic pressures. This data was calculated out of 199 countries and territories. In *Freedom of the Press 2014* shows that there was fourteen percent of the population that had the freedom.

The status shows that there has been decline in the freedom of the press which is deterioration in the situation of the journalists.

5.1.3. H3: Threats faced by the journalists risk their life.

The content analysis of the research shows that whenever the journalists tried to report on the topics like politics, corruption or crime they end up destroying their life (refer to 4.1). They are either harmed by the politicians or they lose their life in the process. The journalists criticize the government and tell the truth to the public but risk their life in doing so.

The journalists like Gauri Lankesh, Jagendra Singh, and Jamal Khashoggi have lost their life due to their work. Gauri Lankesh was a journalist who criticized the Bhartiya Janta Party in her newspaper and due to which she

was shot dead. They said that whosoever will criticize the government, they will not spare them. Jagendra Singh was a famous journalist in Uttar Pradesh and he reported on the wrongdoings and corruption done in the states and burnt by government.

There are many more journalists who lost their lives while performing their duty or have put the life in danger.

5.2. Recommendation

5.2.1. The freedom of press is an important element for the country to have democracy. Therefore, it is only the duty of organizations but also the public to promote the freedom of press. They can voice out against the government whenever they suppress the journalists and stop them from doing their duty. The government cannot do anything if there is no support from the public. The journalists are being destroyed by the government officials and the public can be the one to save them.

5.2.2. The organizations like *Reporters without Borders* or *Committee to Protect Journalists* can work harder on the collection of the data and helping the states to protect the journalists with emphasizing on the laws.

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