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# Laws Protecting Journalists from Online Harassment

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## ABSTRACT

*Journalists are not safe even in their own country and there is an urgent need for effective laws for the protection of journalists in India. Journalism plays a very important role in our society, without which the world would be ignorant. It has become strenuous to find the correct balance between the right to express freely and protect journalists from abuse and threats. Journalists are increasingly becoming the victims of harassment, including death threats, verbal abuse and smear campaigns etc. Freedom of press is considered to be an integral part of freedom of speech and expression. The research paper dives deep into the subject of crimes which are conducted against journalists. The text also cites a few instances where journalists have been victims of various crimes and how it has affected the country in terms of democracy. It also emphasizes the need for legislation for the safety of journalists. It also provides various means that the authority can implement for access to right to speech and expression to be an informed citizen.*

## I. INTRODUCTION TO JOURNALISM

An activity of gathering, evaluating, producing and presenting news and information is known as journalism. The main function of journalism is to establish the facts and share the facts as much as possible, it establishes a common base for debate on harder questions of what the society faces over its interests and values.

### Types of Journalism:

1. Political Journalism
2. Investigative Journalism
3. Business Journalism
4. Crime Journalism
5. Arts Journalism

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## 6. Celebrity Journalism

## 7. Sports Journalism

## 8. Lifestyle Journalism

In Layman's Language Journalism is producing and distributing the reports on the current happenings based on facts and is supported by evidence and proofs. A journalist's work is known as Journalism.

Journalism plays a very important role in our society, without it the world would be ignorant. It helps in waking up to the realities of the world. The media act as the vehicle for the "voice of a voiceless"- expressing the opinion of all those in our society. It provides necessary information that people need to make important decisions. It is the part of communication that keeps us informed of the changing events, issues, and characters in the world outside and brings transparency. In this 21st century, its role has increased dramatically, becoming a journalist is a new way of contributing to our society.

Attacks on journalists appear to be rising recently in countries around the globe, various international, national and regional institutions as well as civil societies have expressed concerns about the impact of harassment of journalists on freedom of expression and free flow of information. Journalists are increasingly becoming the victims of harassment, including death threats, verbal abuse and smear campaigns etc. These include attacks allegedly directed by governments or politicians, or by individuals displeased with media coverage or generally with the press, with a common goal to intimidate journalists into silence and put a stop to investigative reporting that is intended to expose misdeeds. It has become strenuous to find the correct balance between right to free expression and protect journalists from abuse and threats.

### **Literature Review**

The laws protecting journalists from online harassment have been well researched.

- **Beate Josephi (2012)** studied that democracies may offer Legislative Framework for freedom of speech and expression but they fail to offer protection to the journalists.
- **JV Pavlik (2013)** studied that there are 4 principles to ensure long term success in news media: proper research, dedication to freedom of speech, dedication to pursuit of authenticity and truth in reporting, and ethics.
- **Julie Posetti and Hannah Storm (2018)** studied that Countries should act in accordance to the United Nations General Secretary Report (UN, 2017a) on

Protection of women journalists which have a gender sensitive approach towards the issue of security and safety of female journalists. The civil society should provide legal assistance and advice, physical protection, technical assistance and psychological help as per the requirement when dealing with the female journalists affected by Sexual assault or Sexual harassment.

- **Michelle Ferrier, Nisha Garud (2018)** studied that Emotional stress is somehow the result of online harassment which may require legal as well as technological remedies to alleviate the injury which may harm the reputation of the female journalists.
- **Gina Masullo Chen, Paromita Pain, Victoria Y Chen, Madlin Mekelburg, Nina Springer, Franziska Troger (2018)** studied that many female journalists complain that when they engage with their online audience, they often face sexist remarks that attack, criticize, threaten the based on their sexuality.

## II. ARTICLE 19(1)(A) AND FREEDOM OF PRESS

*“Freedom of the press, if it means anything at all, Means the freedom to oppose and criticize”*

**-George Orwell**

Article 19(1)(a)<sup>3</sup> of the India constitution holds the concept of the right to freedom of speech and expression which has been granted to all of its citizens. Article 19(1)(a) includes the right to communicate one’s views and beliefs at any point of time through any medium or source, e.g., oral communication, writing, picture, film etc. It also includes the freedom to communicate and right to spread or pass on or publish opinions.

Under the constitution of India, the freedom of speech and of the press is not an absolute right, it is followed by reasonable restrictions mentioned under article 19(2) of the constitution. Article 19 clause (2) enables the legislature to impose certain restrictions on article 19 (1)(a) under following heads:

1. security of the State,
2. friendly relations with foreign States,
3. public order,
4. decency and morality,
5. contempt of court,

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<sup>3</sup> Manmeet Singh, Freedom of Press - Article 19(1)(a), LEGAL SERVICES INDIA, [http://www.legalservicesindia.com/article/1847/Freedom-of-Press---Article-19\(1\)\(a\).html](http://www.legalservicesindia.com/article/1847/Freedom-of-Press---Article-19(1)(a).html)

6. defamation,
7. incitement to an offence, and
8. sovereignty and integrity of India.

It has been described as a universal human right. It is not the entitlement for the politicians nor is it the birthright of the journalists. In simple words journalists are just exercising their normal freedom of speech and expression as any other citizen. A free press is the building block to a democratic society. It circulates information, news, opinion, comments and ideas and holds those in power to account. The press provides a platform for diversification of voices to be heard, It is the guardian of the constitution and acts as a watchdog of the government as well as a performer and educator. India's position in 'press without borders' freedom of press index has dropped to 142<sup>nd</sup> in 2020<sup>4</sup> from 136<sup>th</sup> in 2015. India is behind its neighbors including Sri Lanka on 127<sup>th</sup> , Nepal on 112<sup>th</sup> , Bhutan on 67<sup>th</sup> , Afghanistan on 122<sup>nd</sup> and Myanmar on 139<sup>th</sup> position.

In the middle of the nationwide lockdown in India from march 24<sup>th</sup> 2020 which was held in 4 phases:

- Phase 1: 25<sup>th</sup> March 2020 -14<sup>th</sup> April 2020 (21 days)
- Phase 2: 15<sup>th</sup> April 2020 - 3<sup>rd</sup> May 2020 (19 days)
- Phase 3: 4<sup>th</sup> May 2020 - 17<sup>th</sup> May 2020 (14 days)
- Phase 4: 18<sup>th</sup> May 2020 - 31<sup>st</sup> May 2020 (14 days)

Where the goal was to control the spread of Covid-19 in India on the other side the journalists across India were charged with sedition and summoned to the police stations for reporting the mishandlings of the government during the pandemic. It was clearly the violation of the fundamental right which is mentioned in Article 19(1)(a) which guarantees freedom of speech and expression to its citizens.

Freedom of speech is the foundation of a democratic nation. It is an essential function of the democratic process. Freedom of speech opens up a channel for debate and discussion of issues. It plays a crucial role in opinion formation of the public on various issues like political, social, and economic matters. There are 4 important justifications for the freedom of speech and expression and are as follows:

▷ Aspect of development and self-fulfillment

▷ Active participation in democracy

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<sup>4</sup> Bansari Kamdar, COVID-19 and Shrinking Press Freedom in India, *The Diplomat* (May 29, 2020, 11:04 AM), <https://thediplomat.com/2020/05/covid-19-and-shrinking-press-freedom-in-india/>

P Expressing political attitudes and beliefs

P Discovery of truth by open debate or discussion

In **R. Rajagopal vs State Of T.N (1995)**<sup>5</sup>, the supreme court held that the government has no authority to impose a prior restraint upon publication of defamatory material against its officials. Public authority who apprehends that they may be defamed could not prevent the press from publication of such material, they can take action for damages after publication of such material if it is proved that the publication was based on false facts.

In **Indian Express Newspapers (Bombay) (P) Ltd. v. Union of India (1985)**<sup>6</sup>, Venkataramiah, J. of the Supreme Court of India emphasized the importance of freedom of press. He stated that freedom of press is the heart of political and social intercourse and has now taken the role of the public educator making formal and non-formal education possible especially in developing countries.

In **Bennett Coleman & Co. v/s. Union of India (1972)**<sup>7</sup> The Supreme Court held that although article 19(1)(a) does not mention freedom of press anywhere, it is implied that freedom of speech and expression includes freedom of press and circulation.

In **Sakal Papers Ltd. v. Union of India (1962)**<sup>8</sup>The number of pages and size which a newspaper could publish at a price was fixed by the Daily Newspapers (Price and Page) Order, 1960. The following was held to be ultra vires as it violates the freedom of press and not a reasonable restriction under Article 19(2).

In **Romesh Thaper v/s The State of Madras (1950)**<sup>9</sup> Justice P. Shastri stated that freedom of expression included the concept of freedom of circulation of ideas which is covered under right to propagation of ideas.

### III. JOURNALIST OR TERRORIST?

India is ranked 14<sup>th</sup> among the nations where journalists are murdered or assassinated and their killers go free: Committee to protect journalist.

According to the **committee to protect journalists**, there have been **20 (twenty) murders**<sup>10</sup>

<sup>5</sup> R. Rajagopal vs State Of T.N., 1995 AIR 264, 1994 SCC (6) 632 (India)

<sup>6</sup> Indian Express Newspapers (Bombay) (P) Ltd. v. Union of India, 1986 AIR 515, 1985 SCR (2) 287 (India)

<sup>7</sup> Bennett Coleman & Co. v/s. Union of India, 1973 AIR 106, 1973 SCR (2) 757 (India)

<sup>8</sup> Sakal Papers Ltd. v. Union of India, 1962 AIR 305, 1962 SCR (3) 842 (India)

<sup>9</sup> Romesh Thaper v/s The State of Madras, 1950 AIR 124, 1950 SCR 594 (India)

<sup>10</sup> 20 Journalists Killed in India between 2010 and 2021 / Motive Confirmed / Murdered, Committee to Protect Journalists, [https://cpj.org/data/killed/asia/india/?status=Killed&motiveConfirmed%5B%5D=Confirmed&type%5B%5D=Journalist&typeOfDeath%5B%5D=Murder&cc\\_fips%5B%5D=IN&start\\_year=2010&end\\_year=2021&group\\_by=location](https://cpj.org/data/killed/asia/india/?status=Killed&motiveConfirmed%5B%5D=Confirmed&type%5B%5D=Journalist&typeOfDeath%5B%5D=Murder&cc_fips%5B%5D=IN&start_year=2010&end_year=2021&group_by=location)

of journalists, **4 (four) dangerous assignment deaths<sup>11</sup>** and **1 (one) crossfire death since 2010<sup>12</sup>** in India. In the past **10 years**, around **324 (Three twenty four) journalists<sup>13</sup>** worldwide have been silenced through murder and **85% (Eighty five)** of these cases have no convictions. “It serves as a encouraging message to the people who try to censor or control media through violence” says **CPJ**

- **Gauri lankesh<sup>14</sup> (Lankesh Patrike)**

She was an Indian journalist turned activist from Bengaluru, Karnataka. She was an outspoken left-wing journalist. She was an editor in **Lankesh patrike**, a kannada weekly which was started by her late father P. Lankesh. On 5<sup>th</sup> September 2017, Gauri lankesh was returning back to her home from her office, a man approached her in between, his face was hidden by a motorcycle helmet, he fired as she ran towards the house, about 10 feet away. She collapsed before she made it inside her house. The reports of Autopsy suggested she has been shot once in the back and shot twice in the chest. The fourth shot was misfired

- **Jagendra Singh<sup>15</sup> (Shahjahanpur Samachar)**

Jagendra Singh used to run a facebook page by the name of **Shahjahanpur Samachar**. Jagendra singh had written many posts regarding Rammurti Singh Verma (Minister in Uttar Pradesh Government) alleged links to illegal mining and corruption. On 8th June 2015 he had been allegedly set on fire by criminals and local policemen under the direction of Uttar Pradesh Minister Rammurti Singh Verma. In his dying declaration he held Rammurti Singh Verma responsible for the attacks, he died of his injustries on 8th of september.

- **Rajesh mishra<sup>16</sup> (Media Raj)**

Rajesh Mishra used to work for a Hindi language weekly **Media Raj**, he had written many articles of financial irregularities in local schools, according to the media reports. His family reported that he had been threatened during the week leading up to the attack. On march 1,

<sup>11</sup>4 Journalists Killed in India between 2010 and 2021 / Motive Confirmed / Killed on dangerous assignment, Committee to Protect Journalists, [https://cpj.org/data/killed/asia/india/?status=Killed&motiveConfirmed%5B%5D=Confirmed&type%5B%5D=Journalist&typeOfDeath%5B%5D=Dangerous+Assignment&cc\\_fips%5B%5D=IN&start\\_year=2010&end\\_year=2021&group\\_by=location](https://cpj.org/data/killed/asia/india/?status=Killed&motiveConfirmed%5B%5D=Confirmed&type%5B%5D=Journalist&typeOfDeath%5B%5D=Dangerous+Assignment&cc_fips%5B%5D=IN&start_year=2010&end_year=2021&group_by=location)

<sup>12</sup> 1 Journalists Killed in India between 2010 and 2021 / Motive Confirmed / Killed in crossfire, Committee to Protect Journalists, [https://cpj.org/data/killed/asia/india/?status=Killed&motiveConfirmed%5B%5D=Confirmed&type%5B%5D=Journalist&typeOfDeath%5B%5D=Crossfire&cc\\_fips%5B%5D=IN&start\\_year=2010&end\\_year=2021&group\\_by=location](https://cpj.org/data/killed/asia/india/?status=Killed&motiveConfirmed%5B%5D=Confirmed&type%5B%5D=Journalist&typeOfDeath%5B%5D=Crossfire&cc_fips%5B%5D=IN&start_year=2010&end_year=2021&group_by=location)

<sup>13</sup> Bansari Kamdar, Journalism in India: A Dangerous Pursuit?, The Diplomat (Oct. 31, 2018), <https://thediplomat.com/2018/11/journalism-in-india-a-dangerous-pursuit/>

<sup>14</sup> Siddhartha Deb, The killing of Gauri Lankesh. Retrieved, columbia journalism review (winter 2018), [https://www.cjr.org/special\\_report/gauri-lankesh-killing.php](https://www.cjr.org/special_report/gauri-lankesh-killing.php)

<sup>15</sup> PTI, Journalist burnt to death; UP minister booked, The Hindu (June 09, 2015, 18:49 PM), <https://www.thehindu.com/news/national/other-states/up-minister-booked-in-journalist-killing-case/article7298669.ece>

<sup>16</sup> Rajesh Mishra, Committee to Protect Journalists, <https://cpj.org/data/people/rajesh-mishra/>

2012 the attackers attacked him on the head with an iron rod while he was at a public tea stall in Rewa, Madhya Pradesh. 4 men were arrested including Banerjee who was the owner of the schools Rajesh Mishra was covering. Rajneesh Banerjee was sentenced to imprisonment for life under Section 120b of Indian Penal Code under the charges of murder.

#### **IV. ONLINE HARASSMENT CASES IN INDIA AND CURRENT CHALLENGES**

Journalists often face the threat of online harassment, it has become a plague, spreading its wings as far as it can go, engulfing everyone, making digital platforms unsafe. The freedom to express one's views has been snatched away due to the fear of harassment. Journalists have found themselves in the clutches of online attacks and have to think twice before voicing their opinion or publishing any information online. Following are the instances where the journalist had to face online harassment-

In the state of Himachal Pradesh, authorities in four districts have registered as many as 10 cases against six journalists for their reporting on hunger among migrant workers and lack of food distribution.

- **Dhaval Patel**<sup>17</sup>(**Face of Nation**)

Dhaval Patel is the owner and editor of the Gujarati news portal "**Face of Nation**". On May 11, 2020 he was detained and charged under section 124 A (sedition) of Indian Penal Code and section 54 (spreading false panic) of Disaster Management Act for writing an article about 'the possibility of leadership change in Gujarat' due to accelerating numbers of coronavirus cases in the state.

- **Sandhya Ravishankar**<sup>18</sup>

Sandhya Ravishankar is a Chennai-based freelancer. In 2017 she had written a four-part series in The Wire that implicates Tirunelveli-based mining baron S. Vaikundarajan in illegal sand mining. She faced harsh feedback from his audience on social media platforms such as Twitter and Facebook where the writer received abusive calls and various other threats. Her mobile number was also released on social media by anonymous trolls due to which she began receiving a flood of threatening and abusive calls from unknown people.

#### **V. LAW PROTECTING JOURNALIST**

In India, there is no specific laws that focus on online harassment; therefore, the law officials

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<sup>17</sup> India increasing abuse of laws to harass journalists, INTERNATIONAL PRESS INSTITUTE (May 15, 2020), <https://ipi.media/india-increasing-abuse-of-laws-to-harass-journalists/>

<sup>18</sup> Online harassment and threats for Indian journalist exposing illegal sand mining. (Mar. 24, 2017), <https://ifex.org/online-harassment-and-threats-for-indian-journalist-exposing-illegal-sand-mining/>



and police rely on the constitution of India, Indian Penal Code (IPC) etc. with particular reference to the following articles/ sections: –

### **Constitution Provision**

- **Article 19 (1) (a)** - The idea of every citizen being able to express their views in public has been granted under Article 19(1)(a) as known as Freedom of Speech and Expression. Article 19(1)(a) includes the right to communicate one's views and beliefs at any given point of time through any medium, e.g. oral communication, writing, picture, film etc. It also includes the freedom to communicate and the right to spread or publish opinions.
- **Article 19(1) (g)** - article 19(1) (g) of the constitution of India allows every person to practice any profession, or to carry on any occupation, trade or business of their choice.
- **Article 21-** Article 21 prohibits the deprivation of personal liberty of any person, its state that no person shall be deprived of his life and personal liberty and except in accordance to procedure established by law. It applies to any person whether citizen or alien, it is also available to a foreigner.

### **Provision from Other Acts**

- **Section 354D of Indian Penal Code<sup>19</sup>** - section 354 D talks about Stalking. This section states that if any man follows a women or contacts or attempts to contact such women repeatedly despite a clear indication of disinterest by that women or monitors the use of internet, email or any other form of electronic communication by that women shall be punished on first conviction for a term which may extend to three years and shall be liable to fine. On subsequent conviction shall be punished for a term which may extend to five year and also be liable to fine.
- **Section 503 of Indian Penal Code--** Section 503 talks about Criminal intimidation, which includes any individual threatening to cause an injury either to the person , property or reputation which he or she is not legally empowered to do .
- **Section 506 of Indian Penal Code<sup>20</sup>** - section 506 provides for the punishment for criminal intimidation, it states that whoever commits criminal intimidation shall be punished with a term which may extend to two years, or with fine, or with both and if

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<sup>19</sup> The Indian Penal Code, 1860, Acts of parliament, 1860 (India)

<sup>20</sup> The Indian Penal Code, 1860, Acts of parliament, 1860 (India)

the threat led to any grievous hurt or death or disruption of property by fire or cause an offence punishable with death or life imprisonment or commits an offence with imprisonment for a term which may extend to seven years, shall be punished with imprisonment which may extend to seven years, or with fine, or with both.

- **Section 507 of Indian Penal Code<sup>21</sup>** - section 507 talk about criminal intimidation by an anonymous communication, it states that whoever commits the offence of criminal intimidation by an anonymous communication, or take precaution to conceal the name or abode of the person from whom the treat comes, shall be punished with imprisonment for a term which may extend to two years, in addition to the punishment provided for the offence by section 506 IPC.
- **Section 509 of Indian Penal Code<sup>22</sup>** - section 509 states if any individual in public commits any act such as utterance of any word or any sound or gesture, with the intention to affect the reputation and modesty of women shall be punished for a term which may be extended to one year, or with fine, or both.
- **Press Council Act, 1978<sup>23</sup>**- Press Council Act, 1978 was a crucial step towards ensuring the safety of press and maintaining the standard of the press. The act focused on empowering the press to ask relevant questions to any individual or authority which also includes government. Section 13 of the act provides the object and function of the press council. The important functions of the press council are-
  - to help news agencies and newspapers to maintain their independence,
  - to formulate a code of conduct for journalists, news agencies and newspapers;
  - to keep review of any development likely to restrict supply and dissemination of news of importance to public interest.
  - to concern itself with the developments such as concentration of or various other aspects of ownership of newspapers and news agencies which may affect the independence of the press.
- **Protection of media professional bill, Maharashtra<sup>24</sup>**- Maharashtra Media Persons and Media Institutions (Prevention of Violence and Damage or Loss to Property) Bill,

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<sup>21</sup> The Indian Penal Code, 1860, Acts of parliament, 1860 (India)

<sup>22</sup> The Indian Penal Code, 1860, Acts of parliament, 1860 (India)

<sup>23</sup> Press Council Act, 1978, Acts of parliament, 1978 (India)

<sup>24</sup> Rahul Tripathi, Maharashtra only state with law to protect scribes, TOI (Nov. 24, 2019),

2017 is the first law in the country which ensures protection for journalists, it was first introduced by Devendra Fadnavis government. The bill recommended a punishment up to three years or a fine of up to Rs 50,000 or both in case of attack on media persons on duty.

## **VI. ACTIONS BY INTERNATIONAL BODIES FOR PROTECTING JOURNALISTS RIGHT**

### **The UN Plan of Action on the Safety of Journalists<sup>25</sup>**

The UN aims to create a safe and free environment for journalists both in conflict and non-conflict situations to strengthen democracy and development worldwide. Its initiatives include to establish coordinated inter agency mechanisms to deal with issues related to journalists safety as well as assisting countries in developing legislation favourable to freedom of expression and information, and to support their efforts in implementing existing principles and international rules.

The Plan recommends to work in cooperation with governments, professional associations, NGOs and media houses to conduct awareness on issues such as existing international conventions, the dangers posed by rising threats to media professionals and various existing guides on the safety of journalists.

UN Agencies, programmes and funds currently working on the safety of journalists are as follows -

- o Office of the High Commissioner for Human Rights
- o United Nations Department of Public Information
- o United Nations Office on Drugs and Crime
- o United Nations Development Programme
- o United Nations Department of Political Affairs
- o United Nations Department of Peacekeeping Operations

### **Initiative taken by UNESCO in the field of safety of journalists<sup>26</sup>**

UNESCO is partnering with various journalism professional organizations to ensure the

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<https://economictimes.indiatimes.com/news/politics-and-nation/maharashtra-only-state-with-law-to-protect-scribes/articleshow/72214265.cms>

<sup>25</sup> UN Plan of Action on the Safety of Journalists and the Issue of Impunity, (Nov. 01, 2017) <https://en.unesco.org/un-plan-action-safety-journalists>

<sup>26</sup> UNESCO Partners in the field of the Safety of Journalists: United Nations Educational, Scientific and Cultural Organization (Jan. 21, 2021), from <http://www.unesco.org/new/en/communication-and-information/freedom-of-expression/safety-of-journalists/unesco-partners-in-the-field-of-the-safety-of-journalists/>

safety of journalists. Few organizations are given below-

- Article 19- article 19 is an international human right organization which helps defend and promote freedom of expression all over the world.
- Committee to Protect Journalists (CPJ)- it is an independent nonprofit organization established in 1981 to promote press freedom and monitor abuse against press around the world.
- Free Press Unlimited-thich is an organisation that supports local journalists in war and conflict zones to provide their audience trustworthy information. They believe that information can be life and death importance.
- International Federation of Journalists (IFJ)- The IFJ helps promote action to protect social justice and press freedom through free, strong and independent trade unions of journalists.
- International Press Institute (IPI) – It is a network of journalists, media and editors at an international level who aim to improve the standards of the practice and improve the status of freedom of expression.
- World Association of Newspapers (WAN)- It was established in 1948. It is a worldwide association of 76 national newspapers and several independent editors. It is a non profit and non governmental organisation.

## **VII. CONCLUSION**

As we already know freedom of press is nowhere mentioned in the constitution of India, although it is closely related to Freedom of speech and expression which is mentioned in article 19(1)(a). Freedom of press is considered to be an integral part of freedom of speech and expression.

Nowadays Journalists often face online harassments in the form of cyber bullying, trollings, defamation, life threats, and public shaming. Journalists are not safe even in their own country and there is an urgent need for effective laws for the protection of journalists in India.

Maharashtra government took a bold step for the protection of journalists in the state and in the same way other states should also implement such laws for the protection of journalism and journalists. Journalists work for the society and their interest must be protected at any cost because we cannot imagine a profound democracy in a country like India without Journalism.

Journalism is the 4th wing/branch of the Indian democracy , judiciary, executive and legislature being the other 3. Healthy Journalism plays an important role in shaping minds and framing opinions on any subject which is important for democratic countries like India. The media act as the vehicle for the “voice of a voiceless”- expressing the opinion of all those in our society. Journalists work for the society and their interest must be protected at any cost because we cannot imagine a profound democracy in a country like India without Journalism.

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### VIII. REFERENCES

1. B Josephi. (2013). How much democracy does journalism need?. *Journalism*, 14(4), 474-489.
2. J.V. Pavlik. (2013). Innovation and the future of journalism. *Digital journalism*, 1(2), 181-193.
3. M. Ferrier, & Garud-Patkar. N. (2018). TrollBusters: Fighting online harassment of women journalists. In *Mediating Misogyny* (pp. 311-332). Palgrave Macmillan, Cham.
4. J. Posetti, & H.Storm. (2018). Violence Against Women Journalists—Online and Offline. *Setting the Gender Agenda for Communication Policy: New Proposals from the Global Alliance on Media and Gender*, 75-86.
5. Chen, G. M., Pain, P., Chen, V. Y., Mekelburg, M., Springer, N., & Troger, F. (2020). ‘You really have to have a thick skin’: A cross-cultural perspective on how online harassment influences female journalists. *Journalism*, 21(7), 877-895

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