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## THE EVOLUTION AND IMPACT OF MEDIA TRIALS IN THE INDIAN JUSTICE SYSTEM: AN ANALYSIS

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### ABSTRACT

The media is one of the essential pillars of democracy in India, as it enables the people to voice their opinions under the freedom of speech and expression provided by Article 19(1)(a). However, with the privatization of media organizations and the stiff competition in acquiring television ratings points (TRP), the emergence of media trials has become inevitable. The paper provides a detailed analysis of the evolution of media laws in India, from the traditional social practices and colonial censorship to post-independent laws. It focuses on the negative impacts of conducting simultaneous investigations of media on the justice system. These include the undermining of the principle of presumed innocence for the accused, causing severe secondary victimization to the victims, and potentially influencing the subconscious of the judiciary. Through a review of landmark judicial decisions such as the K.M. Nanavati case and the postponement doctrine in Sahara India, this paper underscores the urgent necessity for uniform regulatory mechanisms to ensure that journalism fortifies, rather than subverts, the rule of law.

**Keywords:** Media trial, Fair Trial, Democracy, Judiciary, Rule of Law, Speech and expressions.

## **INTRODUCTION**

In a democratic country like India media is regarded as one of the four pillars of democracy<sup>1</sup>. Media plays a vital role in moulding the opinion of the society and it is capable of changing the whole viewpoint through which people perceive various events. There is a need for fair and independent media in our country. Article 19(1)(a) of Constitution of India talks about freedom of speech and expression which incorporates the freedom of press which is not expressly given under this article but in various cases Supreme Court The freedom of speech and expression guaranteed by Article 19(1) of the Constitution includes the freedom of the press and, like all constitutional freedoms, must be exercised within reasonable boundaries<sup>2</sup>.

The media can be commended for initiating a trend in which it assumes an active role in holding the accused accountable. Particularly over the past two decades, the emergence of cable television, local radio networks, and the internet has significantly expanded the reach and influence of mass media. In our country, the distribution of newspapers and magazines, whether in English or local languages, has been steadily rising. This growing audience, along with the adoption of modern technologies for news collection, has granted media organizations an unparalleled influence in shaping public opinion. A practice that has now become a regular occurrence is that of media trials. Originally intended to disclose the truth about legal cases to the public, this practice has now dangerously encroached upon the justice delivery system. This situation highlights the pressing need for 'responsible journalism,' which requires some level of accountability.

## **OBJECTIVES**

In research, it is essential to outline the objectives of the study. Without clearly defined objectives, research cannot be considered complete. The research objectives are as follows:

- i. To trace and evaluate the evolutionary trajectory of media law in India.
- ii. To systematically assess the multidimensional impact of media trials on the criminal justice system.

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<sup>1</sup> Indian Express Newspapers v. Union of India (1985)

<sup>2</sup> Romesh Thappar v. State of Madras (1950)

- iii. To assess the role of media in influencing public opinion and the judiciary in high-profile cases.

## **GROWTH OF MEDIA LAW IN INDIA**

One of the most important aspects of democratic administration is the media since it gives people more opportunities to voice their opinions. The foundation of Indian democracy is the belief that the general public plays a vital role in national administration. Due to the media, they are able to freely voice their opinions, which is the contrary of what happens in communist nations. Marx's argument holds that citizens are unable to criticize the government in socialist nations. Like any other administration, the state must understand the desires and aspirations of its citizens. One significant channel via which citizens may communicate these desires and aspirations to the government is through the media. Thus, it is commonly said that the media plays a crucial role in the functioning of a democratically elected government. The public's access to information is greatly facilitated by the media. Keeping this in mind, the framers of the Constitution bestowed upon the media a highly significant right: the freedom of speech and expression. The press's freedom to express its opinions, disseminate information, and so on is evidence of a free press. However, this does not imply that there are no limitations on media. The need to tell people the truth gave rise to the concept of Media Trials. This process dates back to the invention of the printing press. Media Trials were once employed by state-run media to paint political rivals as the guilty parties. However, as time passed and the media got increasingly private, the concept of media trials expanded to encompass additional aspects.

## **ANCIENT PERIOD**

In ancient India, the media environment was marked by a vibrant mix of oral storytelling, the development of written manuscripts, the engraving of inscriptions, and the engagement in intellectual discussions. Although there was no official legislative framework for media law, there were unofficial rules and social conventions that controlled media activity. Media practices were influenced by societal norms, cultural traditions, and the authority of religious and political leaders.

## **COLONIAL PERIOD**

Print media became a potent instrument for political discourse, nationalist ambitions, and

communication throughout India in colonial era. With the development of printing technology, newspapers, journals, and pamphlets were established, completely changing the media landscape. Expanding the reach of ideas was made possible in large part by the rise of the vernacular press. Nonetheless, censorship and Press Acts were two ways the colonial administration tried to keep the press under control. Notwithstanding these obstacles, locally owned media were powerful voices that shaped public perception and promoted independence. In the 16th century, Christian missionaries were responsible for bringing the first printing press to India. James Augustus printed the Bengal Gazette <sup>3</sup>for the first time on January 29, 1780. It offered news, promos, and analysis on a range of topics, such as current events in politics and society.

The Marquis of Wellesley issued the Censorship of Press Act, 1799, in May 1799, as part of a regulatory framework aimed at restricting press freedom. It essentially established pre-censorship rules and other news limitations during a time of conflict. An important law that was passed in 1857 was the Licensing Act. This legislation set limits on licensing and preserved the government's authority to stop printed media, including books and newspapers, from being published and distributed. The Act brought back licensing, which was applicable to all publication types, including books published in all possible languages. This statute gave the agency the power to grant or revoke the licence for publication. The government enacted the Indian Penal Code in 1860<sup>4</sup>, which is a universal law. However, this code also prohibits certain offenses that writers, editors, and publishers may commit, such as defamation and obscenity. The Indian Penal Code was amended in 1870, which resulted in the addition of section 124-A, or sedition. This section outlines the sanctions that apply to anybody who attempts to instigate or encourage enmity toward the legitimate government of British India. In 1878, Vernacular Press Act 1878 was passed. It was created to have more control over language journalism, and it was successful in punishing and suppressing publications that were considered seditious. This act gave the commissioner of police or the district magistrate the power to demand that the publisher or editor of any local newspaper that collaborates with the government sign a contract promising not to publish anything that could incite animosity toward the government or among people of different races, castes, or beliefs through publications. A statute known as "The Press Act" was established in 1910, granting the government the right to demand protection from any publication. An earlier version of the Vernacular Press Act had a clause for the same

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<sup>3</sup> Also known as the Calcutta General Advertiser

<sup>4</sup> No. 45, Acts of Parliament, 1860

purpose. British Assembly passed the Copyright Act in 1911. It was adapted in 1914 and given the name India Copyright Act, 1914 because it had provisions that were the same as those in other nations' statutes.

## **POST INDEPENDENCE**

The development of media law in post-independence India represents a sophisticated transition from colonial "rule by law" to a constitutional "rule of law"<sup>5</sup> characterized by a persistent tension between state-imposed restrictions and judicial expansion of expressive liberties. The framers of the Constitution deliberately omitted a specific mention of the "freedom of the press," subsuming it under the broader ambit of Article 19(1)(a) which deals with freedom of speech and expression. Parliament passes number of laws to regulate media in India which are as follows:

### **I. The Press (Objectionable Matters) Act, 1951**

This legislation aims to prohibit the printing and publication of materials that incite crime and other objectionable content. It is designed to uphold public order, decency, and societal harmony. The Act empowers the government to require security from printing presses, seize objectionable publications, and destroy unauthorized newspapers. Furthermore, it repealed various central and state acts related to press control, reflecting the government's commitment to maintaining public order and morality.

### **II. The Cinematography Act 1952**

The legislation aims to ensure that films are suitable for public viewing and adhere to the moral and ethical standards of society. It establishes a system of censorship and certification to protect public interests while allowing for creative expression. This Act gives a Board of Film Censors with advisory panels in regional centers to review every film and approve it for either adult-only or general release. The Board also has the authority to reject approving a movie for release in theaters.

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<sup>5</sup> Article 14 of Constitution of India

### **III. The Drugs and Magic Remedies (Objectionable Advertisement) Act 1954**

This legislation was enacted to regulate drug advertisements in specific contexts and to prohibit the promotion of remedies that claim to possess magical qualities, alongside provisions for related matters.

### **IV. Young Person's (Harmful Publications) Act, 1956**

This legislation forbids advertisements for any publication deemed harmful, characterized as any content that might corrupt a young individual (under 18 years of age) by prompting or persuading them to partake in illegal acts, violence, cruelty, or any other detrimental behaviour.

### **V. The Right to Information (RTI) Act, 2005**

The enactment of this legislation has profoundly influenced the media's function in India. It grants citizens the right to seek information from government bodies, thereby fostering transparency and accountability. As an essential component of the democratic country, the media plays a crucial role in spreading this information and raising public awareness. The RTI Act has empowered the media to expose governmental mismanagement and inefficiencies, thus aiding the democratic process. Additionally, it has established a legal basis for the media to conduct investigative journalism and hold the government accountable. The Act's provisions have been key in strengthening the media's role as a watchdog and champion of the public interest.

## **FACTORS WHICH PROMOTE MEDIA TRIAL**

### **I. Unfettered Freedom given to Press**

A democratic political system, built on involvement of its people, is inherently dependent on the free exchange of ideas and discussion amongst the citizens. It makes clear the vital importance of freedom of the press in a democracy. In the absence of a complete and varied supply of information, the citizens will be unable to play their part in the decision-making process. This point has been beautifully articulated in the U.S. Supreme Court decision<sup>6</sup>, which asserted that "Public opinion should regulate authority,

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<sup>6</sup> West Virginia State Board of Education v. Barnette, 319 U.S. 624 (1943)

not authority by public opinion." However, there are instances where media oversteps its limit for the sake of reporting the truth and invades an individual's rights during his/her trial.

## **II. Privatization of Media Houses and Game of TRP**

The news channels have started to give more importance to the TRP ratings than providing authentic news, thereby deviating from the principles of journalism. The media houses have become increasingly passive and concerned only about creating sensational news that would attract the viewers. One such instance of this trend is the extensive coverage provided by the media for the case of Sushant Singh Rajput<sup>7</sup>, thereby completely ignoring other important news, including the pandemic of COVID-19.

## **III. Absence of Uniform Regulatory Mechanism**

The broadcast media in India is mostly regulated by itself through various agencies like the News Broadcast Federation and the News Broadcasters Association. Like the PCI, these groups have also developed their own codes of ethics in an effort to ensure impartial coverage of events while protecting the identity of its members. Nevertheless, membership in such associations is voluntary, with the leadership often comprised of highly placed individuals from the major news channels. Consequently, regulation becomes the responsibility of the media companies, thus causing conflicts of interest when dealing with complaints.

## **IV. Weak Defamation Law**

There is usually lack of enforcement of the laws on defamation in India. There are many pending cases in the court dealing with different issues, and this reduces the importance attached to defamation cases. In societies where reputation is an essential component of civility and democracy, people are easily defamed because of social media platforms. Media houses have used the freedom of expression to conduct media trials, and they have made false allegations against people.

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<sup>7</sup> Rhea Chakraborty v. State of Bihar and ors., (2020)

## **IMPACT OF MEDIA TRAIL**

The principle of "Law is the king of kings" and "law is supreme" is crucial for a democratic society. The Indian constitution by laying down the legal procedures ensures that all the three arms of the government function according to the judicial precedents laid by the courts of India. With the arrival of technology and the development of electronic media, a tremendous effect has been made on all the sectors of the society including judiciary.

With time, the significance of the media increased throughout the world. However, the commercialization of media resulted in the media being owned by businessmen taking advantage of technological developments along with the lack of law regulating the practice of media. As a result of this phenomenon, the media was able to acquire immense power and influence and interfered in the activities of other state organizations. An important result of this process has been the occurrence of "media trial" whereby the media tries to act as the court of the people at times even overtaking judicial processes. Trial by media has become common terminology in the 21st century where the media decides the character of an individual without any verdict from the judicial courts.

Media trials influence the administration of justice in several ways:

1. Impact on the Accused
2. Impact on the Victim
3. Impact on the Judiciary

### **IMPACT ON THE ACCUSED**

The concept of the "media trial" deals a serious and irreparable constitutional blow to the accused individual, completely undermining the very foundation of criminal law, which is the doctrine of the presumption of innocence. The assumption by the media of the roles of both the investigator and the judge gives rise to an alternative narrative that effectively deprives the accused of their right to a fair trial, an essential right guaranteed under Article 21 of the Constitution. This obsessive and sensationalized media coverage leads to instant character assassination, thereby making sure that the accused is tried and found guilty in the court of public opinion before any official charges are framed against them. The repercussions go far

beyond damaging the reputation of the individual. Prejudiced reporting may deter important witnesses, corrupt evidence, and despite the inherent strength of the judiciary, instill subconscious prejudices even in experienced judges. Moreover, such media intrusion violates the right to privacy of the accused individual and turns their private life into a public spectacle. Even in instances of acquittal, the societal stigmatization remains permanent, rendering the legal exoneration a pyrrhic victory and demonstrating a severe miscarriage of justice orchestrated entirely outside the courtroom.

### **IMPACT ON THE VICTIM**

The legal debate on media trials revolves around the bias generated against the accused individual, the effect on the victim is no less damaging and even more worrying from a constitutional perspective. The parallel investigation carried out by the media leads to further victimization of the complainant through constant vilification and violation of privacy, thereby violating the right to dignity guaranteed under Article 21 of the Indian Constitution. In cases of high publicity, the sensational approach adopted by the media in its attempt to create a narrative makes sure that the victim loses his/her anonymity in statutory cases such as rape and sexual assaults. This discourages the victim from coming forward in the future or cooperating with law enforcement authorities. Moreover, the societal polarization brought about through constant media coverage can also lead to intimidation of victims and witnesses alike, thus affecting the sanctity of the judicial procedure. Instead of working towards achieving justice, media trials tend to commodify the victim's trauma and turn it into a spectacle. The result is that the administration of justice is badly affected, and the victim finds herself facing an adverse and intrusive environment not just in the courtroom but also outside in public, which means that her basic right to a fair and objective justice process is denied. The media has brought many cases of sexual assault into public view, but in doing so, for reasons of sensationalism, they often end up revealing the identity of the victim. Some trials are even televised as if they were television serials.

### **IMPACT ON THE JUDICIARY**

Having examined the impacts on victims and the accused, we must now consider whether media trials can influence judges, even on a subconscious level. This is a contentious issue, as judges and juries are, after all, human beings and may be susceptible to outside influences. Different countries have varying perspectives on whether media coverage can affect judicial

decision-making. In the American context, it is generally believed that the judiciary remains impervious to media bias<sup>8</sup>. Conversely, the Anglo-Saxon view, which India also aligns with, suggests that judges, like anyone else, can be influenced by media coverage, whether consciously or unconsciously. This perspective was affirmed by the Supreme Court of India in the case of *Reliance Petrochemicals Ltd. v. Proprietors of Indian Express*<sup>9</sup>, where the Court issued an order preventing The Indian Express newspaper from publishing any articles, comments, or editorials related to an ongoing civil matter concerning the corporation. The Supreme Court emphasized the need for restraint in reporting on ongoing legal issues, recognizing the potential for media coverage to prejudice the proceedings. The Law Commission's report<sup>10</sup>, which delves into the pros and cons of media trials, recommends measures to mitigate the negative impacts of sensationalized news on the justice system. Although the report is not yet public, it is suggested that the Commission advocates for restrictions on publishing potentially harmful content about the accused from the moment of arrest. In the case of *M.P. Lohia v. State of West Bengal*<sup>11</sup>, when media outlets presented biased coverage on cases still pending in lower courts, the Supreme Court issued a strong rebuke. The Court noted that such reporting could significantly interfere with the judicial process and administration of justice.

## JUDICIAL RESPONSE TO MEDIA TRIAL

India is a democratic nation where the rule of law and a liberal constitutionalism serve as the foundations of governance. In India, the concept of "freedom of the media"<sup>12</sup> has generated debate ever since British colonial authority ended. The Indian Constitution establishes fundamental rights and a directive ideology of state policy for the benefit of both the people and the state. The press exercises its fundamental freedom to speech and expression as a "citizen." It has both beneficial and harmful effects on society. Positively, it is fulfilling the idea of the welfare state and giving voice to the people by assisting them in delivering justice. On the other hand, adversely, it is going beyond legal bounds and breaching other basic liberties guaranteed by the Constitution of India. To understand the phenomenon of media trial and its implications, it is essential to examine various judicial pronouncements, as the term "media

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<sup>8</sup> *West Virginia State Board of Education v. Barnette*, 319 U.S. 624 (1943)

<sup>9</sup> 1988(4) SCC 592

<sup>10</sup> "Trial by Media: Free Speech versus Fair Trial Under Criminal Procedure (Amendments to the Contempt of Courts Act, 1971),

<sup>11</sup> 2005(2)SCC 686

<sup>12</sup> INDIA CONST. art. 19, cl. 1(a)

trail" is inherently associated with multiple complexities. A judicial perspective offers a comprehensive understanding of how trial by media disrupts the criminal justice system, leading to unwarranted interference with the administration of justice, criminal contempt, obstacles to fair trial, and violations of the reasonable restrictions outlined in Article 19(2) of the Indian Constitution.

In the case of *K M Nanawati v. State of Maharashtra*<sup>13</sup> This 'open-and-shut' case may have been India's first media trial because the accused was famous. Naval officer K.M. Nanavati shot his wife's lover, Prem Ahuja. Driven by an intense media campaign portraying Nanavati as an honorable hero, a jury acquitted him. However, the High Court and Supreme Court overturned this perverse verdict, convicting him of murder and effectively triggering the abolition of India's jury system.

The Mumbai Terror Attack<sup>14</sup> case is a prime example in which media coverage endangered the lives of security guards, police, and hostages, suggests a serious reporting failure. In other words, everything about national security was at risk. Even in an emergency, there was a clumsiness for news in this instance. In this instance, a relationship between media coverage and Target Rating Point (TRP) was observed. In the aforementioned case, the Supreme Court noted that Article 19(1)(a) is subject to reasonable constraints and that it is not acceptable to justify free expression by endangering Article 21 or national security.

*Sahara India Real Estate Corp. Ltd. v. SEBI*<sup>15</sup> The Supreme Court established the principle that courts are permitted to issue postponement orders to prevent media reporting that may hinder the administration of justice, thereby acknowledging the necessity for judicial protections against media trials while simultaneously upholding the freedom of the press.

*R.K. Anand v. Registrar*<sup>16</sup>, Delhi High Court In this case it involves a sting operation, the Court held that while investigative journalism can expose corruption, it should not disrupt legal proceedings or provoke public outrage that prejudices ongoing trials. *Arun Jaitley v. State of Uttar Pradesh*<sup>17</sup> the Court reaffirmed the delicate balance that must be maintained between

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<sup>13</sup> 1962 AIR 605

<sup>14</sup> *Mohammed Ajmal Amir Kasab v State of Maharashtra*, AIR 2012 9 SCC 1

<sup>15</sup> *Sahara India Real Estate Corp. Ltd. v. SEBI*, (2012) 10 S.C.C. 603 (India).

<sup>16</sup> *R.K. Anand v. Registrar*, Delhi High Court, (2009) 8 S.C.C. 106 (India)

<sup>17</sup> *Arun Jaitley v. State of Uttar Pradesh*, (2016) 2 S.C.C. 342 (India)

freedom of the press and responsible journalism, especially in sensitive criminal cases.

Collectively, these rulings illustrate the judiciary's dynamic approach to parallel media investigations, anchored in the doctrine of harmonious construction to ensure that the freedom of the press and the sanctity of a fair trial coexist seamlessly.

## **RECENT DEVELOPMENT IN MEDIA TRAIL IN INDIA**

The jurisprudence surrounding "media trials" in India is anchored in a continuous and delicate constitutional balancing act. The courts are routinely tasked with harmonizing the freedom of the press under Article 19(1)(a) (Freedom of Speech and Expression) with the fundamental right of an accused to a fair trial and the presumption of innocence, protected under Article 21 (Right to Life and Personal Liberty). In recent years, the Supreme Court of India has taken an increasingly strict stance against parallel media investigations that prejudice sub-judice matters, shifting from mere condemnation of the press to demanding institutional accountability from the State.

In September 2023, the Supreme Court of India<sup>18</sup>, while hearing a batch of petitions concerning custodial leaks and media briefings, Chief Justice D.Y. Chandrachud directed the Union Home Ministry to establish guidelines governing interactions between law enforcement officials and the media. The Court emphasized that premature disclosures concerning ongoing investigations could undermine the presumption of innocence and inadvertently influence public narratives prior to trial. This initiative was commended as a significant advancement toward institutionalizing ethical standards in criminal reporting.

*Abhishek Banerjee v. Union of India*<sup>19</sup> the Supreme court declined to issue a blanket media gag order on reporting of an ongoing case involving a prominent political figure. The Court, while reaffirming the precedent laid down in *Sahara India Real Estate Corp.*<sup>20</sup>, It was determined that prior restraint on media reporting should be applied judiciously and only in instances where there is a clear and significant risk of compromising the administration of justice. The ruling reaffirmed the judiciary's dedication to safeguarding press freedom while acknowledging the possible detrimental effects of prejudicial reporting.

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<sup>18</sup> Supreme Court Directive in Custodial Leak PILs

<sup>19</sup> *Abhishek Banerjee v. Union of India*, (2024) 9 S.C.R. 110(India)

<sup>20</sup> *Sahara India Real Estate Corp. Ltd. v. SEBI*, (2012) 10 S.C.C. 603

Recent jurisprudence strongly critiques the shift from investigative journalism to sensationalized broadcasting. In the aftermath of high-profile media spectacles such as the coverage of the Sushant Singh Rajput case<sup>21</sup> and the Tarun Tejpal<sup>22</sup> matter, constitutional courts have laid down firm observations:

Reputational Harm as violation of Article 21 The courts have solidified the principle that the right to reputation is an intrinsic, inseparable part of the Right to Life under Article 21. Dramatized reporting and the airing of unverified claims irreversibly damage reputations, creating a stigma that persists even if the accused is ultimately acquitted.

The "Subconscious Bias" Effect: High Courts and Supreme Court have noted that media pressure can intimidate key witnesses, force investigating officers to bend to public opinion rather than evidentiary facts, and even risk influencing the subconscious mind of the judiciary.

## **CONCLUSION**

Media undoubtedly is a powerful medium and aids exchange of communication, ideas and opinions. Media that is free and independent are more courageous in their pursuit of the truth and are more inclined to take the initiative in a democratic process. However, with freedom of the press also comes the obligation to acknowledge that every action has a substantial aftereffect. In any democracy, the criminal justice system and the free press will inevitably intersect, frequently leading to conflict between the rights to a fair trial and the freedom of speech and expression. It has become common in the media to disregard the dangers of the law and use it for personal gain. Consequently, it is necessary to manage the media's impact on trials since it has an impact on the criminal justice system as a whole including victim, witness, judiciary, police, accused, and lawyer as well as society at large. Free press plays a crucial role in guaranteeing a fair trial by continuously monitoring the legal system and calling for judicial responsibility, which helps to ensure that justice is administered properly. However, the watchdog is attempting to play the part of the special interest, acting as if they are mediating a case outside of court and assuming the role of meddlers of justice, neglecting their duties of holding people accountable, making public issues known, enlightening the public, and uniting the voiceless. It is clear that the press is playing a lively role, but the need for news, sensationalism, and investigative reporting has frequently resulted in a conflict between the

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<sup>21</sup> Rhea Chakraborty v. State of Bihar and ors., 2020

<sup>22</sup> Tarun Jit Tejpal vs The State of Goa 2019

right to a fair trial and the freedom of the press.

## **SUGGESTIONS**

In a democratic nation, the administration of justice is determined by adhering to the appropriate legal procedure rather than being influenced by personal feelings and public opinion. People tend to forget that they are placing unjustified pressure on both the accused and the court administrative system as a whole after witnessing anything on TV and developing an opinion in the public. It has frequently been noted that presiding officers experience pressure of this nature while handling high profile cases. Following the completion of the study, the researcher would like to make the following suggestions:

- i. **Revision of the Definition of "Active" Legal Proceedings:** The current legal approach considers a criminal proceeding to be "active" only when there is a charge sheet. However, the law must define an active case as one where an FIR is lodged or an arrest has taken place. This will prevent the media from indulging in their own investigations and reaching conclusions while crucial investigations are being carried out by the police.
- ii. **Introduction of Strict Liability for Risky Publications:** Media organizations must face strict liability for publishing information that poses serious risks to the justice delivery process regardless of their intention.
- iii. **Establishing an Independent Regulatory Body:** The paper aptly highlights the limitations of self-regulatory organizations such as the News Broadcasters Association. There must be an independent regulatory body to oversee print and electronic media.
- iv. **Granting Punitive Powers to the Regulatory Body:** Such a regulatory body can impose heavy fines, order prime-time apologies, and even suspend broadcasting rights for repeat offenders of journalistic ethics.
- v. **Expansion of Statutory Protection:** Although laws already exist which protect the anonymity of sexual assault victims, there needs to be an expansion of the protection of anonymity by law to include victims of other serious crimes and witnesses involved in investigations from being exploited for profit.

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