
BURNT FACES, SENSATIONAL SCREENS: MEDIA FRAMING, PUBLIC OUTRAGE, AND SENTENCING IN INDIAN ACID-ATTACK JURISPRUDENCE

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ABSTRACT

The law is said to be applied equally for everyone, yet media narratives stringently regulate the response the judiciary as well as the public have to cases of a similar nature. Despite the carefully laid down statutes like the Indian Penal Code, sections 326A-326B, and strict Supreme Court regulations on acid attacks, the conviction rates relating to these laws remain statistically low and are tainted by the response the populace has on the particular victim story. As media narratives oscillate between painting the survivors as either “sensational victims” or “inspirational retaliators”, such attention is dished out very sparsely, leading to most survivors operating from the fringes of the law, in near-invisibility and shadow. These reflect the overall prosecutorial zeal and a highly varied level of sentencing in the few acid attack cases that are brought to light. The depiction of the victims and prosecutors also subtly brings out the bitter reality of acid survivors and how the nature and delays in prosecution vary across the spectrum in such grave cases. The media attention given to cases is more often than not subject to the gender of the victim as well as the gravity of the crime, however the impact this, as well as the distinctions in the application of the law have on the victim and society as large are dire and far-reaching. This research looks into Supreme Court and High Court judgments in acid attack cases, aiming to draw a comparison between the few “popular” cases and the “ordinary” ones.

INTRODUCTION

Section 326A of the IPC¹ defines an acid attack as causing permanent or partial damage, deformity, burns, maiming, disfigurement, disabling, or grievous hurt by throwing or administering acid, or by any other means with such intent, and Explanation 1 to Section 326B² clarifies that the damage or deformity need not be irreversible for liability to arise. The majority of acid-attack victims in India are women, often targeted for rejecting romantic or sexual advances, resisting dowry demands, or not complying with a husband's wishes, in a social context where a woman's beauty, especially her face, is treated as central to her identity and social worth. The attacker, acting from wounded pride, aims to destroy what makes her a woman in society³, leaving survivors to confront a profound crisis of self and dignity as their identity seems to be snatched from them.

Following the incident of the 2012 Nirbhaya gang-rape case,⁴ criminal law reforms introduced Sections 326A and 326B in 2013 to specifically recognize acid attacks as a distinct and grave form of grievous hurt under Section 326⁵. In 2013, after the filing of *Laxmi v. Union of India*⁶, the Supreme Court issued directions restricting over-the-counter sale of acid, limiting purchase to adults with identification and a declared purpose, and mandated that illegal sale be punishable, acid attacks be treated as non-bailable, and a minimum compensation of ₹3,00,000 be paid to survivors by the state.⁷ Yet, implementation remains weak: between 2016 and 2021, at least 1,686 cases of acid attacks and attempts were registered, but only 76 resulted in conviction, with just 10 convictions out of 407 cases for trial in 2016, reflecting systemic apathy and under-enforcement at many different levels in, not just the administration but society in general.⁸

Acid attacks remain a sort of a taboo when it comes to grievous crimes. Murder and homicide are well discussed but the lack of conversation around acid attacks holds an almost undeniable connection with the way judgments are passed, or rather not, in such cases. Only a handful of

¹ Indian penal code § 326A (2013).

² Indian penal code § 326B (2013).

³ Ms. Meghna Bajpai & Ms. Sugandha Singh, *Acid Attack: A Burning Issue in India*, 2 Galgotias Journal of Legal Studies 2-3 (2015).

⁴ *Mukesh & Anr v. State (NCT of Delhi) & Ors* (2017) 6 SCC 1.

⁵ Indian penal code § 326 (1860).

⁶ *Laxmi v. Union of India* (2014) 4 SCC 427.

⁷ *India Supreme Court Orders Curb on Sale of Acid*, BBC News, (July 18, 2013).

⁸ Nivedita Singh & Apoorva Mishra, *As Dwarka Acid Attack Makes News, Data Shows Low Conviction Rates Further Singed Victims | Analysis*, CNN News 18, (Dec. 16, 2022).

cases have been able to garner attention with the victims portrayed as “defiant fighters” or “tragic spectacles”. This attention is highly biased and concentrated to the metro areas, with a majority of the cases being pushed to the sidelines, away from the grasps of both public recognition and a possible road to justice. The public’s eye in such “popular” cases has always been drawn to, not the trials and tribulations of the victim but the brutality of the crime, blindsiding the masses from a victim-centered viewpoint. This differentiated recognition poses a variety of questions that this research aims to answer.

This research paper aims to discuss if an absolute brilliance of attention given to a few acid attack cases leads to stricter or more victim-centered judgments and to what extent does the media outburst influence judgments. It also aims to draw a comparison of such a bias between the “popular” and “ordinary” acid attack cases and if the media framing of survivors as “exceptional” (heroes or martyrs) narrow judicial empathy to a few cases and obscure the structural failures experienced by others.

The way attention is given out in this biased sense may lead to inconsistencies in the judgments passed in such cases. This not only depicts a faultline in the judicial system, but also obscures the public’s sense of proper justice and the heavily underlined idea of equality before the law. This also does not comply with the fact that justice should not only be done but also seem to be done. The judiciary, should instead observe transparency in deciding such cases and aim for reaching the ideal of acting in a vacuum when it comes to the absolute and bleak discrepancies dished out when it comes to media outrage.

LEGAL AND INSTITUTIONAL FRAMEWORK

Section 326A was added as an extra clause to Section 326 that signifies grievous hurt by use of acid. It is a punitive measure for anyone who causes permanent or partial damage or deformity to, or causes grievous hurt to any part of the body of a person by throwing or administering acid. The punishment for the same is 10 years or above, even extending to life imprisonment and a fine. It also signifies that such fine must be reasonable and be paid in whole to the victim.⁹ The next addition, section 326B expands on the idea of grievous hurt, suggesting that even a voluntary attempt to throw acid on a person would be punishable for a of 5 years, extending to 7 years and be liable to a fine.¹⁰ In both of these, the irreversibility of the damage

⁹ Indian penal code § 326A (2013).

¹⁰ Indian penal code § 326B (2013).

done to the victim isn't necessary for liability to arise.

The Supreme Court issued directives for compensatory measures for acid attack victims, directing that every acid attack survivor must be paid 3,00,000 rupees from the concerned state or Union Territory.¹¹ Of this, 1,00,000 rupees must be paid within 15 days of the incident occurring to enable immediate medical treatment, and the remaining must be paid within 2 months.¹² The Central Victim Compensation Fund (CVCF) provides special financial assistance of 5,00,000 rupees to acid attack victims to meet treatment expenses over and above what the states provide under their own schemes.¹³ In addition to this the Prime Minister national Relief Fund (PMNRF) provides an extra 1,00,000 rupees as immediate temporary relief to acid-attack victims, over and above the amount under victim-compensation schemes. The Ministry of Home Affairs also noted that these were proper compensatory measure and not to be taken as charity.¹⁴

The 226th Report titled "The Inclusion of Acid Attacks as Specific Offences in the Indian Penal Code and a Law for Compensation for Victims of Crime"¹⁵ assesses acid attack prosecutions under the Indian Penal Code (IPC), 1860¹⁶ before sections 326A-326B existed. Here, the cases of acid attack were treated under the general umbrella of grievous hurt provisions. In such cases, the primary sections invoked were section 326, 320, 322, 325 and 307 IPC. Section 326 IPC discusses voluntarily causing grievous hurt by dangerous weapons, acid here, being treated as a dangerous weapon and the punishment under this section was a maximum of 7 years.¹⁷ The short term of punishment was seen as incomparable to the level of damage the victim had to face due to the attack. Section 320 IPC provides a very narrow definition of violations that could be termed as "grievous" which failed to acknowledge the wide spectrum of suffering undergone by the survivor in an acid attack, with the punishment only being of up to 7 years, a fine or both, depending on the severity of the hurt and the circumstances.¹⁸ In all of the above, acid was mostly treated as a dangerous weapon under section 326, but even then, the courts

¹¹ BBC News, Curb on Sales of Acid *supra* note 7 at 2

¹² *Laxmi v. Union of India*, (2014) 4 SCC 427, (India)

¹³ Ministry of Home Affairs, *Compensation to Acid Attack*

Victims, <https://www.mha.gov.in/en/commoncontent/compensation-acid-attack-victims>.

¹⁴ *Supra* note 13.

¹⁵ Law Commission of India, *The Inclusion of Acid Attacks as Specific Offences in the Indian Penal Code and a Law for Compensation for Victims of Crime*, Report No. 226 (2009).

¹⁶ Indian penal code, 1860.

¹⁷ *Supra* note 5.

¹⁸ Indian penal code, § 320 (1860).

often downgraded the judgment to section 324¹⁹ or 323 IPC²⁰, which described simple hurt due to evidentiary issues.²¹ Some of the cases highlighted in the report were:

- A. The Padma case, which occurred in Delhi where the accused threw acid on the victim, her mother and her son. The victim died due to excessive burns and here, the injuries of the secondary victims were sidelined and only the main victim, Padma's death was highlighted in this case. The sentence applied was only for the murder of Padma and not the hurt to the other victims.
- B. The report further provides National Crime Records Bureau (NCRB) data of cases between the years 2000 and 2008, where there were around 174 acid attack incidents in 2000 alone, with most of them being charged under section 326 IPC. The conviction rates in these cases remained to about 20-30% and the sentences rarely exceeded 3-5 years which posed the question of the proper dispensation of justice. there were also frequent acquittals due to the hostility of witnesses and proof of intent.²²

The given data clearly highlights the lack of how the punishments announced in cases before the coming of the 2013 amendment fail to account for the lifelong disfigurement, disability and social ostracism, making the earlier verdicts a farce when compared with the suffering of the victim.

According to official NCRB data, in 2016, there were 407 cases for the trial under "Acid attack and Attempt to acid attack" and by the end of the year 308 cases remained pending in court, indicating that only a small fraction of the cases was disposed and followed through properly. Analyses of NCRB "Court disposal of crime against women" tables show that pendency at the court level exceeded 90% every year from 2016-2021, meaning over nine-tenths of acid attack cases listed for trial remained undecided at the end of the year.²³ In 2017 and 2018, "a little over three per cent" of the total pending cases for trial under the acid-attack heads resulted in conviction, with the rest either acquitted or, in the vast majority, left pending.²⁴ By 2021, out

¹⁹ Indian penal code, § 324 (1860).

²⁰ Indian penal code, § 323.

²¹ *Supra* note 3.

²² *Supra* note 15.

²³ *Supra* note 8

²⁴ Vidhik Kumar, *Acid Attacks in India: A Socio-Legal Report*, 6 Dignity: A Journal of Analysis of Exploitation and Violence 6-7 (2021).

of 773 cases of acid attacks and attempted acid attacks for trial, only 3 attack and 3 attempt cases were convicted, while 754 cases remained pending; convictions thus accounted for well under 1% of cases for trial that year.²⁵

MEDIA ECOSYSTEMS AND FRAMING OF SURVIVORS

In acid attack cases, there are specific typologies of cases that catch the eye of the media. Certain cases receive intense national and international attention while most remain invisible. Research points to how media, popular culture and social media select and frame specific stories, not just the severity of the crime itself but other underlying factors.

- A. The media usually looks for “marketable” narratives, ones that have a uniqueness or a pinch of enticement in them for the public. It usually highlights young female survivors whose stories could be framed as inspirational, heroic or glamorous, creating a mix of pity and celebration that attracts audiences. Narratives that align with familiar themes such as gender-based violence, patriarchal control and “brave survivor” journeys which are easier to sell in the news.

An example of this was the Reshma Qureshi case in 2014.²⁶ This story was publicized due to how she was brutally attacked by her brother-in-law at the age of seventeen after being mistaken for her sister Gulshan while travelling for an Alim exam to Allahbad. She later collaborated with the NGO “Make Love Not Scars” to promote awareness. She also broke systemic societal barriers by walking the runway at New York Fashion Week in 2016, depicting her as a trailblazer, making her story sensational for the public.

- B. Cases that were also linked to legal milestones such as public interest litigations (PIL)s, law reforms or important court judgments. An essential and highly cited case for this scenario is the Laxmi Agarwal case where the victim, Laxmi was attacked at the age of 15 in 2005 for rejecting a marriage proposal from a 32-year-old man.²⁷ This case became insanely essential as Laxmi filed a PIL for the easy availability and

²⁵ *Supra* note 8

²⁶ Shara Ashraf, *11 Things You Didn't Know About Acid Attack Survivor Reshma Qureshi*, The Indian Express (Sept. 9, 2016), <https://indianexpress.com/article/india/india-news-india/11-things-you-didnt-know-about-acid-attack-survivor-reshma-qureshi-3009022/>.

²⁷ *Supra* note 12

unregulated sale of acid. Her PIL also resulted in the Supreme Court releasing the acid sale regulations in 2013. Her case was also highly publicized and sold as an impact story in the movie *Chhapaak*.²⁸ She also became a co-founder for the NGO Chhanv Foundation and The Laxmi Foundation.

Therefore, some acid attacks gain traction, not because they are more serious or gruesome, even though the real impact to the victim cannot be measured, they became popular because such cases become usable for news cycles, films, brands and NGOs. The highly gendered, visually powerful, activist-linked stories that fit media logistics and tap into the public's thirst for narration are amplified with the selfish motives of views. This leaves the less "narratable" cases in the shadows and hence, invisible.²⁹

The popularity of some acid attack cases over others poses several questions of what victim stories became "worthy" of popularity and recognition. NCRB data and a recent retrospective study based on it show that while states like West Bengal and Uttar Pradesh have some of the highest overall numbers of acid attacks, Delhi has, however, consistently been among the top metropolitan cities for such incidents, and often the top city for attacks against women.³⁰ For example, Delhi, Bengaluru, Ahmedabad, Hyderabad, Ghaziabad, Indore and other big cities appear consistently in NCRB data as the main metros reporting acid attacks in 2018-2022. Media- oriented analyses and rights-group commentary note that the cases from Delhi, Mumbai, Bengaluru and other large cities are far more likely to be reported in national English-language media, becoming test- cases and be cited in commentary on acid attacks.³¹

At the same time, socio-legal and medico-legal studies emphasize that a large share of the total acid attack incidents occur in non-metro districts, but these cases rarely get more than one local report and almost never become "national stories".³² This depicts that the cases that become "symbolic" are of socially and legally visible victims.

²⁸ S. Ashwini Chithra & Archana Arul, *Multicultural Factors and the Representation of Acid Attack Survivor in Indian Society Based on Multimodal Discourse Analysis*, 2 International Journal of Multiculturalism 88-89 (2021).

²⁹ Ameeta Verma & Simranjeet Kaur Gill, *Acid Attacks: The Gnawing Problem of Gender-Based Violence*, 10 International Journal of Advanced Research and Innovation 3 (2022).

³⁰ *Acid Attack Cases Continue to Rise, 57 Cases in West Bengal Highest in India: NCRB*, The Wire (Oct. 3, 2025), <https://m.thewire.in/article/government/acid-attack-cases-continue-to-rise-57-cases-in-west-bengal-highest-in-india-ncrb/amp>.

³¹ Editorial, "Acid Attack Jurisprudence in India: Constitutional Promise and Persistent Institutional Failure" *CJP*, December 31, 2025.

³² *Supra* note 3

According to several studies, many high-visibility acid attack cases from metro cities have produced exemplary punishments and relatively faster trials, often with strong judicial rhetoric reflecting media pressure. A few examples of such cases are:

- A. *Laxmi v. Union of India, 2014* (Old Delhi)³³- This case was about how 15-year-old Laxmi Agarwal was attacked on 22 April, 2005 by Naeem Khan and Rakhi for rejecting the 32-year-old Naeem Khan's marriage proposal. This case gained sentimental value and attention a bit later when Laxmi Agarwal filed a PIL and became an inspirational figure for young women all over India. The story of this case was also highlighted when the Hon'ble court issued directives relating to violence against women and the over-the-counter sale of acid. This case was resolved in 2014 with the perpetrators being granted a likely punishment of 3-7 years under section 326 IPC, but were released shortly after. The relative leniency of this punishment prompted Laxmi to file the writ petition which resulted in the popularization of the case.
- B. *State of Maharashtra v. Ankur Panwar, 2019* (Mumbai)³⁴- The incident, which took place in 2013, was the first case where the criminal received a death penalty in an acid attack case. The victim, Preeti Rathi was attacked by stalker, Ankur Panwar on May 2, 2013 at the Bandra Railway Station, causing severe lung/eye damage and her eventual death a month later. Ankur was tried at the Special Women's Court and was convicted under sections 302 IPC³⁵ for murder and section 326B³⁶. This case received a boost when it came to the severity of the punishment as well as how fast the case was resolved, that time period being about 3 years. It was popularized on national television as a "revenge attack" narrative and received a "rarest of the rare" sentencing.
- C. The recent case of Yogesh, 2025 (Delhi)³⁷- In this case, two men forced acid down a minor's throat in 2017, and the victim died due to increased trauma, 18

³³ *Supra* note 6

³⁴ *State of Maharashtra v. Panwar, 2019 SCC OnLine Bom 968.*

³⁵ Indian penal code, § 302.

³⁶ *Supra* note 2

³⁷ Vineet Upadhyay, *Acid Attack Case: Delhi Court says 'Brutal and Diabolical' While Awarding Life Term to Two Men Who Forced Acid Down Minor's Throat*, The Indian Express (Dec. 12, 2025), <https://indianexpress.com/article/legal-news/acid-attack-delhi-court-life-imprisonment-two-men-minor-boy-10416859/>.

months from the incident. Saket court called the incident “brutal”, “diabolical” and a “threat to society” awarding life imprisonment to two men and directed rupees 10 lakhs in compensation to the family. This case received a huge media outrage and highlighted the lifelong agony of the family in concern. The unique nature of the case became a “selling point” for the case.

Both of the above cases and a lot more that keep emerging from metro cities all over India, despite the fact that the distribution of most acid attack cases happen in marginalized regions of the country bring out the public sentiment toward such sensational stories. This also depicts how such cases that are able to come to the limelight are disposed of in a relatively speedy manner as most cases remain pending for over 10 years³⁸ and with exemplary sentencing being given to the culprits. Even the use of language, by both large media houses as well as judicial officers, focusing on the brutality of the crime, making such an emphasis another way to catch the public’s eye. This further relates to more stringent outcomes. This again highlights the steep disparity that media attention and the lack of it can bring to this, otherwise overlooked category of grievous crimes.

On the other hand, there are cases that took years to be disposed of and are in fact still under trial for 16+ years. These cases were not brought to public light and lay pending before the courts, with victims awaiting their turn at justice.

A. *Shaheen Malik v. Union of India 2025*³⁹ (Haryana)- In this case, Shaheen Malik faced an attack on November 19, 2009 in Panipat, Haryana. The Sessions Court acquitted Yashwinder Bala and Mandeep Mann, the two accused on December 24, 2025 under sections 326A, 120B and 308 IPC. This case has only now gained media attention due to the delays it faced and the huge period of pendency. It was also brought to light that there were major technical lapses on the part of the police and other officials in their failure to collect evidence in a timely manner.

Cases like these bring to light the duality in the judicial response to different cases of the same

³⁸ *SC Asks All High Courts to Submit Details of Pending Acid Attack Cases in 4 Weeks*, The Economic Times (Dec. 4, 2025), <https://economictimes.indiatimes.com/news/india/sc-asks-hcs-to-provide-details-of-pending-acid-attack-trials-across-country/articleshow/125760364.cms?from=mdr>.

³⁹ *Delhi Court Acquits 3 in 2009 Acid Attack Case*, The Tribune (Dec. 29, 2025), <https://www.tribuneindia.com/news/delhi/delhi-court-acquits-3-in-2009-acid-attack-case/>.

or similar nature. Many factors, such as the place where the attack occurred, the storyline behind the attack, the background and age of the victim, as well as, in some cases the gender of the victim play an essential role in determining the response of the media toward that particular case. Furthermore, some cases gain this surge in popularity due to being cited for legislative reforms or important writ petitions and PILs. This media response further relates to the judicial action taken against the perpetrators as well as how fast the courts deal with the case. Most cases, due to this partiality remain stranded midway through the road to justice.

NORMATIVE ANALYSES

The narrative created around the “popular” acid attack cases refer mainly to the sensational and emotive aspects of the story rather than focusing on gaining justice for the victim. The victim is portrayed in several different lights as either a “tragic victim” or an “inspirational survivor”.

For the victimization of the survivor, phrases such as “brutal attack”, “horrifying”, “shattered life” were most commonly identified that seem to draw attention toward the sensationalism of the attack and led to the public expressing pity for the victim which drove public pressure for stringent reforms.⁴⁰ In the other case the portrayal of the victim shifts to an inspirational narrative with words such as “defiant survivor”, “from victim to victor” that beg to offer a different viewpoint than before and again lead to a rise in public sentiment⁴¹ but in this scenario, glorifying the victim. Here, the narrative seemed to shift from the actual attack to the response of the survivor and may be lesser likely to influence a stringency and call for quicker reforms due to the mindset shift in the public.

Both of these, although drive public outrage and response, they treat the victim in very different lights, painting two distinct and almost opposing pictures of the victim. All of these narratives point to the dichotomy and variety in response from the public which essentially shapes the judicial aspect of the specific case and situation.

These stories cover only the cases that make headlines and may still lead to proper and timely as well as relatively proportionate convictions. The “ordinary” cases that get shunned away from the limelight due to the lack of a “selling point” unfortunately do not come under this

⁴⁰ Harsimran Gill & Karen Dias, *Indian Acid Attack Victims Share Their Stories*, AlJazeera (Mar. 10, 2016), <https://www.aljazeera.com/features/2016/3/10/indian-acid-attack-victims-share-their-stories>.

⁴¹ Vishnu, *Ten Inspiring Acid Attack Survivors Who Rewrote Their Destiny*, Hindu Post (May 17, 2025), <https://hindupost.in/featured/ten-inspiring-acid-attack-survivors-who-rewrote-their-destiny/>.

category. Such cases, such as the Shaheen Malik case⁴² are left to face long delays and a relative leniency in the convictions, if any to the actual damage done on the victim. Therefore the narrative analyses only apply to the “extraordinary” cases while leaving out the vast majority of stories out of this narrow purview.

CONCLUSION

The acid attack stories that take place in socially and legally visible settings, in metropolitan cities such as Delhi, Mumbai and Bengaluru make headlines in newspapers and are brought to light by the media. In turn the way media houses and social media frame the victim becomes essential determining factors as to what judicial response the concerned case would get and when, as some cases garner attention mainly because of the fact that they have been put aside and remain pending for an extended period of time.

Courts and judicial officers, may acknowledge the social context of a particular case, but ground their judgment in reason and a uniformity of rulings. This does not mean that the judiciary should operate in a vacuum, rather focus on the facts of the case rather than the public sentiment that arise from the story and its portrayal. A more victim-centric view is advised to be taken by, not just the judicial, but also the legislative authorities to provide timely relief, compensation and rehabilitation to the victims of such a debilitating and life-threatening crime.

The media should also take accountability for responsible and sensible portrayal of case stories, focusing not on the brutality of the crime or the inspirational and defiant actions of the victim, but provide narratives in a way that can be helpful in the victim’s recovery and reintegration into society. They should focus on structural analyses and not sensationalism.

⁴² *Supra* note 37.