
FREEDOM OF SPEECH AND EXPRESSION AND SOCIAL MEDIA: AN EXIGENCY FOR BALANCING

Aleena Rose Jose & Anagha O, B.Com. LLB (Hons), His Highness Maharajas Govt. Law College, Ernakulam

ABSTRACT

Technological developments have made many changes in the communication sector. The advent of internet led to the development of virtual communication. Nowadays, social media became an integral part of people's life. Social media is one of the most popular means of computer mediated communication and it plays a crucial role in the decision making process of people with regard to an issue. Nearly half of the population in India is using social media. The Covid 19 pandemic made social media and other online platforms more popular among general public. They express their views and opinions in social media under the Right to Freedom of Speech and Expression guaranteed by Article 19(1)(a) of Indian Constitution. However, it is also been increasingly used for illegal acts. Two recent incidents are cited in the introduction for better understanding of this issue. Cyber laws existing in India is neither appropriate nor adequate to address this issue. Therefore, it is the need of the hour to frame appropriate social media regulations. The regulations imposed should be in such a manner that it do not hinder the citizen's Right to Freedom of Speech and Expression. This article highlights the importance of striking a balance between these two. It discusses in detail the definition and types of social media, right to access to social media and the restrictions imposed on this right by the Constitution. It also analyses in detail the Information Technology Act of 2000 and the controversial Section 66A of the same. This article throws light into the current status of social media in today's society by tagging the recent incidents. This article ends with a handful of creative suggestions to address this burning issue. All the references in support of the theme is enclosed at the end.

Keywords: Social Media, Fundamental Rights, Speech and Expression, Restrictions, Information Technology

Introduction

In November 2012, a girl was arrested for a Facebook post on her profile in which she had questioned why the city had come to a standstill following the death of Shiv Sena leader Bal Thackeray. The post she updated, quoted verbatim was: “With all respect, every day, thousands of people die, but still the world moves on. Just due to one politician died a natural death, everyone just go bonkers. They should know, we resilient by force, not by choice. When was the last time, did anyone showed some respect or even two minutes silence for Shaheed Bhagat Singh, Azad, Sukhdev or any of the people because of whom we are free living Indians? Respect is earned, given and definitely not forced. Today Mumbai shuts down due to fear, not due to respect”. A friend of hers who ‘liked’ the post was also arrested. There was a lot of uproar following their arrests and the court later dropped charges against two girls.¹

The communal disruption in Baduria, in the state of West Bengal is yet another grim remainder of how the social media has become an agent provocateur for social discord. The riot on July 2017 was the result of a “blasphemous” post in Facebook by a 17 year old boy which led to the death of one and 25 injured, including 20 policemen. The irate mob torched around 12 police vehicles, looted and ransacked several houses in the area.²

In the former incident, the freedom of speech and expression of a person in social media is hindered and the latter shows how this freedom is being misused. These are two extremes we find in the world of social media today. Its high time to strike a balance between these two. Well framed laws to regulate social media without hampering the freedom of speech and expression is the need of the hour.

Social Media

Social media is a computer-based technology that helps the sharing of ideas, thoughts, and information through virtual networks. It is internet-based media which gives the users quick information of content. Content includes photos, documents, videos etc. Andreas Kaplan and Michael Haenlein define social media as “a group of internet-based applications that build on the ideological and technological foundations of web 2.0 , and that allow the creation and exchange of user-generated content.”³ Web 2.0. refers to internet platforms that allow for interactive participation by users. Another variant of social media is mobile social media, that is when social media is used in combination with mobile devices it is called mobile social media. This is the most widely used variant of social media across the globe.

The Indian population has actively using social media. Indian on average spends around 2.25 hours on social media daily. The number of internet users in India has grown to a whopping 624 million, which is roughly 45% of the total population of India.⁴

Types of Social Media

In 2010, Kaplan and Haenlein classified social media into six different types:

- a. Collaborative projects (e.g. Wikipedia)
- b. Blogs and micro blogs (e.g. Twitter)
- c. Content communities (e.g. YouTube)
- d. Social networking sites (e.g. Facebook)
- e. Virtual game worlds (e.g. World of War craft)
- f. Virtual social worlds (e.g. Second Life)⁵

Freedom of Speech and Expression

According to Thomas Friedmann, “The more time you spend in India, the more you realize that this country is one of the world’s greatest wonders- a miracle with a message. And the message is that democracy matters.”⁶

India is one of the largest countries in the world which protects all the fundamental rights of the citizens. Every citizen has the right to express their thoughts through any medium including social media. Comparing to fellow citizens in other nations, this picture is really soothing or mesmerizing. In this twenty-first century, the role of social media influenced the life of people all over the world and they started to express their opinions through virtual world. COVID -19, pandemic also enhanced the opportunities of virtual arena.

Personal liberty is the most important of all Fundamental Rights. Article 19 to 22 of the Indian Constitution deal with different aspects of this basic right. These four Articles provide the backbone of the chapter on Fundamental Rights. The foremost among this is the right to speech and expression, which is guaranteed under Article 19(1)(a). By virtue of 19(1)(a), all citizens shall have the right to freedom of speech and expression. But this right is subject to limitations

imposed under Article 19(2) which empowers the State to put 'reasonable' restrictions' on specified grounds.

Freedom of speech and expression includes the right to express one's own convictions and opinions freely by words of mouth, writing, printing, pictures, theatre or any other mode. It thus includes the expression of one's ideas through any communicable medium or visible representation such as gesture, signs and the like⁷. Communicable medium includes social media where people express their views. This right connotes also publication and thus freedom of press is included in this category.

Freedom of expression has four broad special purposes to serve: it helps an individual to attain self-fulfillment, it assists in the discovery of truth, strengthens the capacity of an individual in participating in decision making and it provides a mechanism by which it would be possible to establish a reasonable balance between stability and social change.⁸ All members should be able to form their own beliefs and communicate them freely to others.

Freedom of speech and expression is an internationally recognized right and Article 19 of UDHR states that everyone has the right to freedom of opinion and expression, this right includes freedom to hold opinions without interference and to seek, receive and impart information and ideas through media and regardless of frontiers.

Right to Access Internet /Social Media and Freedom of Speech and Expression

We are living in a time where everything is linked to internet. COVID-19 pandemic has made internet an essential component of our lives. Social media or internet is a vital communication tool through which individuals can exercise their right to freedom of speech and expression and exchange information and ideas. In many of the movements that attracted global attention recently, social media played a key role by enabling people to connect and exchange information instantly and by creating a sense of solidarity.

Emphasizing the importance of internet, the UN Special Rapporteur on the promotion and protection of the right to freedom of speech and expression in his report, which was submitted before the Human Rights Council, stated that the internet has become a key means by which individuals can exercise their right to freedom and expression and hence, internet access is a human right.⁹ Report further stressed States should ensure that internet access is maintained all times, even during times of political unrest. The States were also reminded of their positive

obligation to promote or to facilitate the enjoyment of the right of freedom of expression and the means necessary to exercise this right, including the internet. The States were also instructed to adopt policies to make the internet widely available, accessible and affordable to all. Moreover, Article 19 of the Universal Declaration of Human Rights [UDHR] and Article 19(2) of the International Covenant on Civil and Political Rights [ICCPR] also provides for freedom of speech and expression even in case of internet and social media.

In its recent judgement in *Faheema Shirin R K v. State of Kerala & Ors*,¹⁰ the High Court has recognized that mobile phones and access through it are part and parcel of the day to day life. The court looked at resolutions adopted by UNHRC and the General Assembly which unequivocally point to the fact that how internet access plays a key role in accessing information and its close link to education and knowledge. The court took the view that the right to access the internet has been read into the fundamental right to life and liberty, as well as privacy under Article 21. The court added that it constitutes an essential part of the infrastructure of freedom of speech and expression.

In *Anuradha Basin v. Union of India*,¹¹ the Supreme Court held that freedom of speech and expression through the internet is one of the integral parts of Article 19(1)(a). It also ruled that an undefined restriction of internet services would be illegal and that orders for internet shutdown must satisfy the tests of necessity and proportionality.

Thus, we can conclude that freedom of speech and expression is recognized as a fundamental right in whatever medium it is exercised under the Constitution of India and other international declarations. And in the light of increasing use of internet and social media as a medium of exercising this right, access to this medium has also been recognized as a fundamental human right.

Restrictions on Freedom of Speech and Expression

The freedom of speech and expression does not confer on the citizens right to speak or write without responsibility. It is not an unconditional license giving immunity from every possible use of language and prevents punishment for those who target and abuse others using this freedom. Article 19[3] of the International Convent on Civil and Political Rights [ICCPR] imposes restrictions on the following grounds :

a) Provided by law and

b) Necessary for respect of the rights or reputations of others, for the protection of national security, public order, or public health or morals

Right to freedom of speech and expression is not an absolute right and it allows the government of India to frame laws and impose restrictions on reasonable grounds. As per Article 19[2] of the Indian Constitution, restrictions on the freedom of speech and expression can be imposed on the following grounds :

- a) Sovereignty and integrity of India
- b) Security of the State
- c) Friendly relations with foreign countries
- d) Public order
- e) Decency or morality
- f) Contempt of court
- g) Defamation
- h) Incitement of an offence

Cyber Laws in India and Social Media

Although there is no particular legislation which covers the leverage of opinion and expression or violation on social media but there are certain provisions in cyber law which can be addressed in case of any violation or misuse of social media . The legislations and the relevant provisions are listed below :

Information Technology Act – 2000¹²

(a) Under Chapter XI of the Act, Sections 65, 66, 66A, 66C, 66D, 66E, 66F, 67, 67A and 67B contain punishments for computer related offences which can also be committed through social media viz. tampering with computer source code, committing computer related offences given under Section 43, sending offensive messages through communication services, identity theft, cheating by personation using compute resource, violation of privacy, cyber terrorism, publishing or transmitting obscene material in electronic form, material containing sexually

explicit act in electronic form, material depicting children in sexually explicit act in electronic form, respectively.

(b) Section 69 of the Act grants power to the Central or a State Government to issue directions for interception or monitoring or decryption of any information through any computer resource in the interest of the sovereignty or integrity of India, defense of India, security of the State, friendly relations with foreign States, public order, for preventing incitement to commission of any cognizable offence, for investigation of any offence.

(c) Section 69A grants power to the Central Government to issue directions to block public access of any information through any computer resource on similar grounds.

(d) Section 69B grants power to the Central Government to issue directions to authorize any agency to monitor and collect traffic data or information through any computer resource for cyber security.

(e) Section 79 provides for liability of intermediary. An intermediary shall not be liable for any third party information, data or communication link made available or hosted by him in the following cases-

- his function is limited to providing access to a communication system over which such information is transmitted, stored or hosted.
- He does not initiate, select the receiver and select or modify the information contained in the transmission.
- He observes due diligence and other guidelines prescribed by the Central Government while discharging his duties.

Again, an intermediary shall be liable in the following cases:

- He has conspired, abetted, aided or induced by threats, promise or otherwise in the commission of the unlawful act.
- He fails to expeditiously remove or disable access to the material which is being used to commit the unlawful act, upon receiving actual knowledge or on being notified by the Government.

(f) If any intermediary fails to assist, comply with direction and intentionally contravenes provisions under Sections 69, 69A and 69B respectively, he shall be liable to punishment.

(g) Section 43A provides that where a body corporate possessing, dealing or handling any sensitive personal data or information in a computer resource owned, controlled or operated by it, is negligent in implementing and maintaining reasonable security practices and procedures thereby causing wrongful loss or wrongful gain to any person, it shall be liable to pay damages by way of compensation to the affected person.

(h) Section 70B provides for an agency of the Government to be appointed by the Central Government called the Indian Computer Emergency Response Team, which shall serve as the national agency for performing functions relating to cyber security.

The central government has also enacted rules and timely amendments to give effect to various provisions of this Act, that includes The Information Technology (Procedure and safeguards of interception, Monitoring and Decryption of Information) Rules – 2009, The Information Technology (Procedure and Safeguards for Blocking for Access of Information by Public) Rules – 2009, The Information Technology (Procedure and Safeguard for Monitoring and Collecting Traffic Data for Information) Rules – 2009, The Information Technology (Intermediaries Guidelines) Rules – 2011, The Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules – 2011. The Information Technology Act was also amended in 2008, 2015, 2018 and 2020 to bring about adequate changes. On 29th June 2020, the Indian Government banned 59 Chinese mobile apps and on 24th November 2020, another 43 Chinese mobile apps were banned supported by section 69A of IT Act and citing national security interests. This move of the Indian Government has been criticized for possibly being in conflict with Article 19(1)(a) of the Constitution of India as well as with WTO agreements.¹³ The Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules - 2021 is secondary or subordinate legislation that suppresses India's Intermediary Guidelines Rules – 2011. The 2021 rules have stemmed from Section 87 of the Information Technology Act, 2000 and are a combination of the draft Intermediaries Rules, 2018 and the OTT Regulation and Code of Ethics for Digital Media.

Section 66A of Information Technology Act, 2000

Of all these provisions, Section 66A has been a matter of widespread discussions in recent times. Section 66A of Information Technology Act was inserted by the Information Technology (Amendment) Act of 2008 which provides punishment for sending offensive messages through communication channels and states :

Any person who sends, by means of a computer resource or a communication device,—

- (a) any information that is grossly offensive or has menacing character;
- (b) any information which he knows to be false, but for the purpose of causing annoyance, inconvenience, danger, obstruction, insult, injury, criminal intimidation, enmity, hatred, or ill will, persistently by making use of such computer resource or a communication device,
- (c) any electronic mail or electronic mail message for the purpose of causing annoyance or inconvenience or to deceive or to mislead the addressee or recipient about the origin of such messages shall be punishable with imprisonment for a term which may extend to three years and with fine.

Explanation: For the purposes of this section, terms "electronic mail" and "electronic mail message" means a message or information created or transmitted or received on a computer, computer system, computer resource or communication device including attachments in text, images, audio, video and any other electronic record, which may be transmitted with the message.

A glimpse into this provision clearly shows that there is an inherent inconsistency between the phraseology of Section 66A and Article 19(1)(a) of the constitution which guarantees right to freedom of speech and expression to all Indian citizens. Grounds for reasonable restrictions on freedom of speech and expression are clearly stated under Article 19(2). But under Section 66A, restrictions have been placed on freedom of speech and expression on several other grounds, apart from those mentioned in the constitution. There are several anomalies in the provision, which are conflicting with the free speech requirements. Words like "gross offensive", "menacing character", "annoyance", "danger", "obstruction", "insult" and "injury" do not have any precise definition.

Adding fuel to the fire, several incidents of misuse of this provision was reported across the country. In November 2012, a Puducherry businessman Ravi Srinivasan was arrested under Section 66A for his tweet accusing Karti Chidambaram, son of then Finance Minister P. Chidambaram, of corruption.¹⁴ In September 2012, a freelance cartoonist Aseem Trivadi was arrested under Section 66A of the IT Act and other Sections under IPC and Prevention of Insults to National Honour Act, 1971 on the ground that his cartoons depicting widespread corruption in India were offensive.¹⁵ In the same year, two Air India employees were arrested by the

Mumbai Police for posting content on Facebook that was against a trade union leader and some politicians and were in custody for 12 days.¹⁶ These are a few incidents which attracted public attention in this regard.

As result, a lot of petitions challenging the constitutionality of this provision was filed across different courts in India. In November 2012, a Delhi based law student Shreya Singhal filed a Public Interest Litigation (PIL) in the Supreme Court of India.¹⁷ The petition challenged the constitutionality of the section wherein she argued that the section was vaguely phrased, as result it violated Article 14, 19(1)(a) and Article 21 of the constitution. Similar petitions were filed by founder of MouthShut.com and NGO Common Cause. The PIL was accepted on 29th November 2012 and on 24th March 2015, the Supreme Court ruled that Section 66A is unconstitutional in entirety. The court said that Section 66A of IT Act, 2000 is “arbitrarily, excessively and disproportionately invades the right of speech” provided under Article 19(1) of the Constitution of India.¹⁸

Current Scenario

With the ease of internet access, the number of social media users in India stood at 440 million in January 2021.¹⁹ Furthermore, the social network users in the country were expected to be almost a billion or more by 2040. This statistics reminds us the importance of properly regulating the world of social media. Social media is playing a unique role in the functioning of democracies all over the world. Through social media and internet, citizens can unite despite territorial limitations. Although everyone is not physically present, the force of protest is not diminished in any way.

Social media campaigns have bring about many positive changes in society. A recent example of productive use of freedom of speech and expression in social media can be stated from Kerala. A one-and-a-half year old child named Mohammed was suffering from the rare disease of Spinal Muscular Atrophy (SMA).²⁰ The curative for this disease is a drug named Zolgensma which costs 18 crore rupees.²¹ A massive campaign took place via social media to save the life of the child and a total sum of 46 crore was collected within a week.²² Social media played a crucial role in the time of natural calamities and other calamities. Social media campaigns also help in bringing out fraudulent practices in society and to curb them. In modern times, social media became a place for the voiceless to raise their voice, a place where people with similar mindset can come together and where people can effortlessly use their freedom of speech and

expression. We have seen great movements in the recent past which started on internet and took the world by storm, one such movement which gained world wide support and engagement was “Black Lives Matters”.²³ This movement started of as a mere hashtag spread like wildfire. This was an eyeopener to the world in addressing issues regarding racism.

It is also important to look at the other side of the coin. It is true that social media is a platform to voice one’s opinions and thoughts on any subject. There have been instances when social media has been lauded for playing a major role in overthrowing oppressive governments or bringing activists together, for various social issues. However, if the idea of or content posted and disseminated is capable of igniting ill-feelings and violence among people, it becomes exploitation of the freedom of speech and expression rather than exercising it. In such cases, social media does not actually play the role of a liberator as it ought to, but instead, causes public menace.²⁴ This is an issue of high relevance in a country like India which is a combination of hundreds of languages, traditions and varied religious beliefs .A small spark can be dangerous if it is left unattended especially in case of social media. There for in some cases it becomes essential to censor social media contents by government to ensure public harmony.

“Freedom of speech and expression is one of the most abused rights in recent times”, then Chief Justice of India S A Bobde said in reaction to centre’s affidavit filed in Tablighi case.²⁵ Several incidents of cyber crimes, defamation, invasion of privacy, incitement of offences, racist and sexist remarks, stalking, abuse, hacking, bullying, victim blaming, harassment and many more are committed through social media. Targeting a person or spreading rumors to deteriorate the image of a person in general public is a widespread negative trend in social media. The most vulgar form of abuse can be seen in the comment section of social media pages and the culprits shields themselves by stating their freedom of speech and expression. Many have lost their harmonious and peaceful life due to the attack of this faceless people. Toxic influencers spreading fake news, stereotypes, racism and misogyny in society is a problem to be addressed. Social media posts have triggered communal violence and mob lynching in many parts of the country. Investigations revealed that hate contents circulated on social media has sparked communal riots in Muzaffar Nagar.²⁶ Two YouTubers who are brothers were arrested in Kerala recently for causing ruckus in government office with the support of the followers and have registered cases against other two who had called for a riot through social media

following the arrest of the brothers.²⁷ All these incidents highlights that its high time to frame social media regulations without hindering the basic right to freedom of speech and expression.

Conclusion

Social media is a very powerful means of exercising one's freedom of speech and expression. However, it is also been increasingly used for illegal purposes and this made it essential to regulate social media. This regulation should not be violative of people's right. Government, service providers and the users should work hand in hand to develop a new healthy social media culture in our nation. Service providers can help in bringing out the best of government regulations by providing timely updates.

The existing cyber laws of India are neither appropriate or adequate in curbing the issues. An alternative for Section 66A of IT Act is the need of the hour. There are many practical difficulties in framing social media regulations in a vast and diverse country like India. Suggestions can be invited from citizens and successful regulative models of other nations can be incorporated. Government can form a committee including technical experts, to look into different facets of the use and misuse of social media and recommend a suitable manner in which it can be regulated without hindering the civil rights of citizens.

References

1. Ram Parmar, *21-Year Old Girl Held for Facebook Post Questioning Mumbai's Bal Thackeray Shutdown*, The Times of India, 20th November 2012, <https://m.timesofindia.com/india/21-year-old-girl-held-for-facebook-post-questioning-mumbais-bal-thackeray-shutdown/articleshow/17276979.cms>
2. Madhuparna Das, *Social Media Posts Trigger Seven Communal Riots in a Month in West Bengal*, The Economic Times, 8th July 2017, https://m.economictimes.com/news/politics-and-nation/social-media-posts-trigger-seven-communal-riots-in-a-month-in-west-bengal/amp_articleshow/59496771.cms#aoh=16292670881130&referrer=https%3A%2F%2Fwww.google.com&_tf=Form%20%251%24s
3. Andreas M. Kaplan & Michael Haenlein (2010), "Users of the World, Unite! The Challenges and Opportunities of Social Media", *Business Horizons*, vol. 53, 2010, pp. Rohit 59-68, at 61.
4. Social Media Statistics 2021, The Global Statistics, <https://www.theglobalstatistics.com/india-social-media-statistics/>
5. Andreas M. Kaplan & Michael Haenlein (2010), "Users of the World, Unite! The Challenges and Opportunities of Social Media", *Business Horizons*, vol. 53, 2010, pp. Rohit 59-68, at 61.
6. Rohit Raj, "Defining Contours of Press Freedom in Backdrop of National Emergency of 1975". *All India Reporter* (Journal Section), 2008, pp. 155-160 at 160.

7. Lowell v. Griffin ,(1939) 303 US 444
8. Dr. J N Pandey, Constitutional Law of India (Central Law Agency,2019)pp.211
9. Report of the Special Rapporteur on Key Trends and Challenges to the Right of All Individuals to Seek, Receive and Impart Information and Ideas of All Kinds through the Internet,2011, UN General Assembly Doc.A/HRC/17/27.
<http://daccess-dds-ny.un.org/doc/UNDOC/GEN/G11/132/01/PDF/G1113201.pdf?OpenElement>
10. Faheema Shirin R.K v. State of Kerala and Ors, (2019)WP(C) No.19716 of 2019(L)India
11. Anuradha Basin v. Union of India,(2020)SCC Online SC 25
12. India passed the Information Technology Act in 2000 in May 2000 in Pursuance of the UN General Assembly Resolution of 30th January 1997. This Resolution adopted the Model Law on Electronic Commerce adopted by the United Nations Commission on International Trade Law. The Information Technology Act,2000 came into force on 17th October 2000 and has been substantially amended through the Information Technology (Amendment) Act, 2008. It got the Presidential assent on 5th February 2009 and came into force on 27th October 2009.
13. Aaron Kamath and Vivek Kathpalia, *India Takes a Tough Stand on Neighboring Apps*,The National Law Review, 27th October 2020
<https://www.natlawreview.com/article/india-takes-tough-stand-neighbouring-apps>
14. *Arrest Over Tweet Against Chidambaram's son propels Mango Man Ravi Srinivasan into Limelight*, India Today Online, 2nd November 2012,
<https://www.indiatoday.in/india/north/story/arrest-tweet-chidambaram-son-karti-ravi-srinivasan-120419-2012-11-02>
15. Jason Burke, *Indian Cartoonist Aseem Trivedi Jailed After Arrest on Sedition Charges*, The Guardian, 10th September 2012,
<https://www.theguardian.com/world/2012/sep/10/indian-cartoonist-jailed-sedition>
16. Saurabh Gupta, *Arrested for Facebook posts, they Spent 12 Days in Jail, Lost their Air India Jobs*, NDTV, 26th November 2012,
<https://www.ndtv.com/mumbai-news/arrested-for-facebook-posts-they-spent-12-days-in-jail-lost-their-air-india-jobs-505559>
17. Shreya Singhal v. Union of India, AIR (2015)SC 1523
18. Jayant Sriram, *SC Strikes Down Draconian Section 66A*, The Hindu, 24th March 2015,
<https://www.thehindu.com/news/national/supreme-court-strikes-down-section-66-a-of-the-it-act-finds-it-unconstitutional/article10740659.ece>
19. Simon Kemp, Digital 2021 : India, Datareportal, 11th February 2021,
<https://datareportal.com/reports/digital-2021-india>
20. *Couple Hopes to crowdfund Rs.18 crores for Drug to Save Life of their One- and- a- half -Year- Old Son*, Kaumudi Online, 5th July 2021,
<https://keralakaumudi.com/en/news/mobie/news.php?id=586774&u=couple-hopes-to-crowdfund-rs-18-crores-for-drug-to-save-life-of-their-one-and-a-half-year-old-son-586774>
21. *Zolgensma, the World's Most Expensive Drug, Costs Rs. 18 crore Per Dose : 5 Points*, Mint, 9th March 2021,
<https://www.livemint.com/science/news/zolgensma-the-world-s-most-expensive-drug-costs-rs-18-crore-per-dose-5-points-11615253464861.html>
22. *Kerala Raised Rs. 46cr for Mohammed, Additional Funds to be Used for Kids with SMA*, Manorama Online, 26th July 2021,

<https://www.onmanorama.com/news/kerala/2021/07/26/mohammed-spinal-muscular-atrophy-46-crore-crowd-funding.html>

23. Adina Campbell, *What is Black Lives Matter and What are the Aims?*, BBC News, 13th June 2021, <https://www.bbc.com/news/explainers-53337780.amp#referrer=https://www.google.com&csi=0>
24. Max Fisher, *When is Government Web Censorship Justified? An Indian Horror Story*, The Atlantic, 22nd August 2012, <http://www.theatlantic.com/international/archive/2012/08/when-is-government-web-censorship-justified-an-indian-horror-story/261396/>
25. Samanwaya Rautray, *Tablighi Case: Freedom of Speech and Expression Most Abused Right in Recent Times, Says SC*, The Economic Times, 8th October 2020, <https://m.economictimes.com/news/politics-and-nation/tablighi-case-freedom-of-speech-and-expression-in-most-abused-right-in-recent-times-says-sc/articleshow/78550618.cms>
26. Neelanjan Sircar, *Not All Communal Riots are Local. Social Media is Now Making Them National*, The Print, 4th March 2020, <https://theprint.in/opinion/not-all-communal-riots-local-social-media-is-making-them-national/375277/>
27. *E Bull Jet YouTubers Granted Bail in RTO Office Ruckus Case*, The New Indian Express, 11th August 2021, <https://www.newindianexpress.com/states/kerala/2021/aug/11/e-bull-jet-youtubers-granted-bail-in-rto-office-ruckus-case-2343027.html>
