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**FROM SEDITION TO SOVEREIGNTY: A CRITICAL ANALYSIS OF
SECTION 152 IN LIGHT OF COLONIAL SEDITION LAWS**- Irffan Z & Dhanush M¹**Abstract**

Section 152 of the Bharatiya Nyaya Sanhita (BNS) criminalizes acts threatening India's sovereignty, unity, and integrity, addressing secessionist incitement, armed rebellion, and subversive activities. While pivotal for national security, its implementation is fraught with challenges, including vague language, misuse against dissent, law enforcement training gaps, digital enforcement hurdles, judicial delays, and systemic incompetence among authorities. This paper critically examines these issues through judicial precedents and proposes reforms to balance national security with constitutional rights. Recommendations include issuing precise guidelines, specialized training, technological upgrades, fast-track courts, and institutional accountability mechanisms to address authority incompetence. By integrating these measures, India can ensure Section 152 serves its intended purpose without undermining democratic values.

KEYWORDS:

Bharatiya Nyaya Sanhita, Section 152, Sovereignty, Authority Incompetence, Judicial Reforms.

1. Introduction:

The Bharatiya Nyaya Sanhita (BNS) marks a transformative shift in India's criminal justice system, replacing the colonial-era Indian Penal Code (IPC). Section 152, which criminalizes acts endangering national sovereignty and integrity, is a key pillar in safeguarding national security. However, its implementation faces significant challenges, from interpretational ambiguities to systemic inefficiencies in enforcement. This paper evaluates these challenges

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and suggests reforms to ensure that Section 152 is applied effectively without compromising democratic values.

The concept of sovereignty is deeply embedded in constitutional jurisprudence, as reflected in landmark cases such as ²*Kesavananda Bharati v. State of Kerala (1973)*, which upheld sovereignty as a basic structure of the Constitution. However, in practical terms, ensuring sovereignty through legal measures requires a balanced approach that does not infringe on fundamental rights such as freedom of speech and expression. The challenges associated with Section 152 are further highlighted when compared with colonial-era sedition laws like Section 124A of the IPC, which has been widely criticized for suppressing dissent and being misused for political ends.

2. Impact of Bharatiya Nyaya Sanhita, 2023 in the Indian criminal justice system:

The Bharatiya Nyaya Sanhita (BNS) marks a significant transformation in India's criminal justice system by replacing the colonial-era Indian Penal Code (IPC) with a more modern and contextually relevant legal framework. One of its key impacts is the modernization of criminal laws, introducing new provisions to tackle mob lynching, cybercrimes, terrorism, and organized crime. This ensures that India's legal system is better equipped to handle contemporary challenges. Additionally, the BNS strengthens national security by criminalizing acts that endanger the country's sovereignty, unity, and integrity. With provisions targeting digital offenses and electronic communications, it aligns the legal framework with the increasing influence of technology in crime. Beyond substantive legal changes, BNS also focuses on procedural efficiency and speedy justice. It works alongside the Bharatiya Nagarik Suraksha Sanhita (BNSS) to streamline investigations, evidence collection, and trials, reducing delays in the judicial process. The inclusion of mandatory forensic evidence in serious crimes enhances the reliability of convictions.

Furthermore, fast-track courts for national security and gender-related offenses are encouraged, promoting faster justice delivery and victim protection. Special attention is given to gender justice, strengthening laws related to sexual offenses, domestic violence, and crimes against children, ensuring that victims receive timely justice and support. However, the

²*Kesavananda Bharati v. State of Kerala (1973) AIR 1973 SC 1461*

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implementation of BNS poses significant challenges. Law enforcement agencies face training gaps, especially in handling cybercrimes and digital evidence, making effective enforcement difficult. Additionally, certain provisions, such as Section 152, contain ambiguous terms like "subversive activities," raising concerns about misuse and suppression of free speech. Another major challenge is the judicial backlog, with courts already overwhelmed by pending cases, and the introduction of new laws further increasing the burden.

BNS also addresses economic and cybercrimes, introducing stricter penalties for financial fraud, identity theft and digital offenses. This modernization ensures that India's criminal justice system aligns with international best practices. However, while these reforms enhance security and law enforcement capabilities, there is a need to balance constitutional rights and human freedoms. Critics argue that vague legal definitions in some provisions could lead to political misuse and curtail dissent.

The impact of BNS extends far beyond Section 152, as it represents a major legal transformation in India's criminal justice, security laws, and citizen rights. While it strengthens law enforcement capabilities, safeguards against arbitrary use and judicial oversight are essential to prevent misuse.

3. Background and critical analysis of Section 152:

Section 152 of the BNS,

“Act endangering sovereignty, unity and integrity of the nation.—Whoever, purposely or knowingly, by words, either spoken or written, or by signs, or by visible representation, or by electronic communication or by use of financial mean, or otherwise, excites or attempts to excite, secession or armed rebellion or subversive activities, or encourages feelings of separatist activities or endangers sovereignty or unity and integrity of India; or indulges in or commits any such act shall be punished with imprisonment for life or with imprisonment which may extend to seven years and shall also be liable to fine.”

Explanation.Comments expressing disapprobation of the measures, or administrative or other action of the Government with a view to obtain their alteration by lawful means without exciting or attempting to excite the activities referred to in this section do not constitute an offence under this section.

In Perusal of Section 152, *ibid*, reveals that same is aimed at protecting the unity, sovereignty and integrity of India. This provision has its genesis to **Section 124A** (sedition) of

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repealed IPC. Offence of Sedition was originally introduced in year 1870 (after 10 years of enactment of IOC in 1860) by the British Government for punishing the acts of hatred or contempt or disaffection towards Her Majesty or the Crown. The offence of sedition under the section 124-A has though been done away in the Indian Penal Code, but a new provision in section 152, somewhat similarly worded, has been brought in by the law makers in Parliament. It criminalizes acts or attempts that incite secession, armed rebellion, or subversive activities, or encourage separatist sentiments that threaten the country's stability.

In England, Sedition laws were historically strict, derived from common law and codified in the *Sedition Act of 1661*. The UK formally abolished sedition as an offense in **2009** through the ³*Coroners and Justice Act, 2009*, citing its incompatibility with free speech in a modern democracy. *In U.S., Sedition Act of 1798*: Originally criminalized false statements against the government, but it was highly controversial and later allowed to expire in **1801**. Even though, *Flag burning is protected free speech under the First Amendment*. The US Supreme Court in ⁴*Texas v. Johnson (1989)* ruled that flag burning is a form of symbolic speech and cannot be punished as sedition or any other crime unless it incites imminent lawless action. The US Constitution strongly protects free speech through First Amendment Protection, limiting the application of sedition laws.

In the case of ⁵*Tejender Pal Singh Vs. State of Rajasthan S.B. Criminal Misc (Pet.) No. 5005/2024, at para 12.4.*, The Justice Arun Monga emphasized to sum up, laws restricting speech must be narrowly tailored. There must be a direct and imminent connection between the speech and the likelihood of rebellion or secession to invoke such provisions. Legitimate dissent or criticism cannot be equated with sedition or antinational acts. For instance, in cases involving Section 124A (sedition) of the repealed IPC, casual or rhetorical statements did not amount to sedition, unless, of course, they incite violence or public disorder. To my mind, a similar approach would apply to Section 152.

In the case of ⁶*S.G. Vombatkere Vs. Union of India Writ Petition (C) No. 682 Of 2021, in Paragraph 25*, the supreme Court stated: We hope and expect that the Centre and State Governments will refrain from registering any FIR, continuing investigations, or taking coercive measures under Section 124A IPC while the aforesaid provision is under

³ Coroners and Justice Act 2009 (2009 c 25)

⁴ 491 U.S. 397 (1989)

⁵ S.B. Criminal Misc (Pet.) No. 5005/2024

⁶ No. 682 Of 2021

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reconsideration. All pending trials, appeals, and proceedings with respect to charges framed under Section 124A IPC shall be kept in abeyance.

4. Present Problems in Implementing Section 152:

The implementation of Section 152 of the Bharatiya Nyaya Sanhita (BNS), which replaces the colonial-era sedition law (IPC 124 A), faces several potential challenges. Below is a structured analysis of the key problems:

4.1 Ambiguity in Terminology:

The broad language used in Section 152 creates a risk of inconsistent interpretation. Terms such as "subversive activities" and "endangering sovereignty" are not clearly defined, leading to potential misuse. The section criminalizes acts that "endanger the sovereignty, unity, and integrity of India," but terms like "endanger" or "integrity" remains broad and subjective. This vagueness could lead to arbitrary enforcement, as law enforcement might interpret these terms inconsistently. In ⁷*Shreya Singhal v. Union of India (2015)*, the Supreme Court emphasized that laws must be precise to avoid arbitrary enforcement, setting a precedent that highlights the need for clarity in security-related laws. Similarly, in ⁸*Kedar Nath Singh v. State of Bihar (1962)*, the Court limited sedition laws to cases involving incitement to violence, suggesting that a similar principle should apply to Section 152.

4.2 Chilling Effect on Fundamental Rights:

Another major issue is the chilling effect on legitimate dissent. The lack of precise definitions in security laws often results in their misuse against political activists and dissenters. In ⁹*S. Rangarajan v. P. Jagjivan Ram (1989)*, the Supreme Court ruled that speech restrictions must be narrowly tailored to avoid undue suppression of free expression. The misuse of broad security laws, as seen in recent UAPA cases, exemplifies the need for safeguards against overreach.

The resemblance of Section 152 to the now-controversial Section 124A of the IPC is striking. Section 124A, originally intended to suppress rebellion against colonial rule, has been widely misused to criminalize peaceful protest and political criticism. India must ensure that Section 152 does not follow the historical trajectory of Section 124A in stifling free expression.

4.3 Law Enforcement and Institutional Challenges:

⁷AIR 2015 SUPREME COURT 1523

⁸1962 AIR 955

⁹1989 SCR (2) 204

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Law enforcement training gaps further complicate the implementation of Section 152. Many officers lack the necessary expertise to differentiate between genuine threats to sovereignty and expressions of political dissent. This issue was highlighted in ¹⁰*P.U.C.L. v. Union of India (2004)*, where the Supreme Court criticized the misuse of surveillance laws due to inadequate training. The ¹¹*Prakash Singh v. Union of India (2006)* case emphasized the need for police reforms, yet implementation remains incomplete in many states.

The incompetence of police authorities in implementing security laws remains a crucial concern. Reports from the ¹²*Law Commission of India Report No. 277 (2018)* indicate that nearly half of the cases filed under security laws were dismissed due to procedural lapses, lack of evidence, or wrongful prosecution. The judiciary has repeatedly expressed concerns about police inefficiency in cases such as ¹³*Arnab Goswami v. State of Maharashtra (2020)*, where the court criticized authorities for prioritizing political interests over investigative rigor.

A comparative analysis of police competence in other democracies reveals stark differences. In the United States, law enforcement agencies operate under strict accountability frameworks, with independent oversight mechanisms ensuring proper application of national security laws such as the Patriot Act. Similarly, the United Kingdom's counter-terrorism measures include periodic judicial and parliamentary reviews to prevent misuse. India must adopt similar best practices to enhance the competence and accountability of law enforcement in handling Section 152 cases.

4.4 Challenges in Prosecuting Online Subversion:

The inclusion of "electronic communication" as a medium for offenses introduces complexities. Determining intent in online posts, satire, or artistic expression could lead to overreach, especially with vague thresholds for what constitutes "endangering" national interests. The digital nature of modern threats requires specialized forensic capabilities, which are lacking in rural law enforcement units. ¹⁴*State of Tamil Nadu v. Suhas Katti (2004)* was an early example of cybercrime prosecution, but gaps in capacity building persist. India faces a 30% shortage in cybersecurity personnel, as noted in the Draft National Cybersecurity Strategy (2021), making digital enforcement a major challenge. Unlike physical acts, online

¹⁰AIR1997SC568

¹¹Writ Petition (civil) 310 of 1996

¹²D.O. No. 6(3) 319 / 2017- LC(LS)

¹³AIR 2021 SUPREME COURT 1

¹⁴Case No.4680 of 2004

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speech often lacks clear context. Proving *intent* to endanger national interests is subjective. Digital tools like VPNs, encrypted messaging (e.g., Signal, Telegram), and anonymous accounts make it harder to trace offenders.

The digital realm is a double-edged sword: while it empowers citizens to engage in democracy, it also amplifies risks of misuse.

Without clear definitions, safeguards, and updated frameworks for digital evidence, Section 152 could:

- Suppress online dissent and creativity.
- Burden courts with frivolous cases.
- Erode India's position as a global digital leader.

4.5 Judicial Delays and Legal Reforms:

India's courts are already overburdened, with over **51 million pending court cases** (as of 2024). Adding Section 152 cases (often politically sensitive and complex) will strain resources further. Judicial delays further undermine the deterrent effect of Section 152. Overburdened courts lead to prolonged trials, weakening the law's ability to prevent threats to national integrity. In ¹⁵*Hussainara Khatoon v. State of Bihar (1979)*, the Supreme Court underscored the right to a speedy trial, yet delays remain a persistent issue. Despite recommendations from the *Malimath Committee Report (2003)*, fast-track courts have not been fully implemented for security-related cases.

Drawing from the recommendations in ¹⁶*Brij Mohan Lal v. Union of India (2012)*, dedicated judicial benches should be created with strict timelines for charge sheets and trials. This will help reduce case backlogs and enhance the law's deterrent effect.

Courts often deny bail in "national security" cases, citing Section 152's severity. This perpetuates pre-trial detention, worsening prison overcrowding. For instance, A student activist arrested for a protest speech might spend years in jail awaiting trial.

5. Recommendations:

The enactment of Section 152 of the Bharatiya Nyaya Sanhita (BNS) reflects India's commitment to safeguarding sovereignty and national integrity. However, its implementation risks perpetuating ambiguities and systemic inefficiencies that threaten constitutional rights and democratic principles.

¹⁵ 1979 AIR 1369

¹⁶ AIR 2012 SUPREME COURT 2653

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Judicial precedents such as ¹⁷*Kedar Nath Singh v. State of Bihar (1962)* and ¹⁸*Shreya Singhal v. Union of India (2015)* underscore the necessity of precision in security laws and the protection of fundamental freedoms.

To reconcile national security imperatives with civil liberties, the following recommendations propose targeted reforms. These measures aim to address interpretational vagueness, institutional incompetence, and procedural delays, ensuring Section 152 upholds its purpose without eroding India's constitutional ethos.

5.1 Legislative Reforms for Clarity and Precision:

Exhaustive definitions:

Amend Section 152 to include precise definitions of terms like "subversive activities," "endangering sovereignty," and "separatist sentiments," aligning with the ¹⁹*Kedar Nath Singh (1962)* precedent that limits criminalization to speech inciting "imminent violence."

Explanation: Ambiguous terms enable arbitrary enforcement. For instance, a protest slogan could be mislabeled as "subversive." Adopting the "imminent violence" threshold ensures only direct threats are prosecuted, protecting lawful dissent.

Codifying Judicial Safeguards:

Explicitly exclude criticism of government policies, peaceful protests, and artistic expression from Section 152's scope.

Explanation: The existing *Explanation* in Section 152 permits lawful criticism but lacks statutory force. Reinforcing this through amendments, as emphasized in ²⁰*Shreya Singhal (2015)*, would prevent misuse against activists or journalists.

Sunset Clause:

Introduce mandatory parliamentary reviews every five years to assess misuse patterns and necessity.

Explanation: Similar to the U.S. Patriot Act's reauthorization process, periodic reviews ensure the law adapts to evolving threats and avoids becoming a permanent tool for suppressing dissent.

5.2 Law Enforcement Accountability and Training:

Specialized Certification Programs:

¹⁷1962 AIR 955

¹⁸AIR 2015 SUPREME COURT 1523

¹⁹1962 AIR 955

²⁰AIR 2015 SUPREME COURT 1523

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Train police officers to distinguish between genuine threats and protected speech using case studies like ²¹*S. Rangarajan (1989)*, which mandates a "clear and present danger" test. *Explanation:* Officers often misinterpret dissent as disloyalty. Training would reduce wrongful arrests, such as prosecuting students for campus debates under Section 152.

Independent Oversight Committees:

Establish committees with retired judges and civil society experts to audit FIRs registered under Section 152.

Explanation: In ²²*Arnab Goswami (2020)*, the Supreme Court criticized politically motivated FIRs. Independent audits would dismiss frivolous cases early, saving judicial resources.

Penalties for Misuse:

Impose fines or suspensions on officers filing baseless charges, as highlighted in the *Law Commission Report No. 277 (2018)*.

Explanation: Nearly half of sedition cases are dismissed due to lack of evidence. Penalizing misuse would deter weaponizing Section 152 against critics.

5.3 Digital Enforcement Framework:

Guidelines for Online Speech:

Adopt the ²³*Brandenburg v. Ohio (1969)* "imminent lawless action" standard to prosecute only speech directly inciting violence.

Explanation: Satirical memes or academic critiques often lack criminal intent. This standard would prevent overreach, as seen in the misuse of Section 66A of the IT Act.

Cyber-Forensic Wing:

Create a dedicated NIA wing to handle digital evidence, supported by rural police training.

Explanation: Cases like ²⁴*State of Tamil Nadu v. Suhas Katti (2004)* took years due to technical gaps. Specialized units would expedite investigations and reduce errors.

Judicial Warrants for Surveillance:

Require warrants for surveillance or content takedowns, mirroring the U.S. Electronic Communications Privacy Act (ECPA).

Explanation: Unchecked surveillance, criticized in *P.U.C.L. v. Union of India (2004)*, violates privacy rights. Warrants ensure accountability and prevent targeting activists.

5.4 Judicial Reforms to Curtail Delays:

²¹1989 SCR (2) 204

²² AIR 2021 SUPREME COURT 1

²³ 395 U.S. 444

²⁴ Case No.4680 of 2004

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Fast-Track Courts:

Establish exclusive courts to resolve Section 152 cases within six months.

Explanation: With 51 million pending cases, delays undermine deterrence. The 2008 Mumbai attacks trial demonstrated the efficacy of fast-track courts in sensitive matters.

Bail Presumption:

Shift the burden to prosecutors to prove intent to incite violence before denying bail.

Explanation: Prolonged pre-trial detention, as seen in student activist cases, violates the right to a speedy trial (²⁵*Hussainara Khatoon v. State of Bihar, 1979*).

Specialized Judges:

Recruit judges with expertise in constitutional law and digital evidence.

Explanation: The ²⁶*Brij Mohan Lal (2012)* case stressed the need for judicial specialization to avoid conflating dissent with sedition.

5.5 Safeguarding Fundamental Rights:**Public Awareness Campaigns:**

Educate citizens on lawful dissent through platforms like NALSA.

Explanation: Rural populations often fear criticizing policies due to legal ignorance. Campaigns would empower them, as upheld in ²⁷*Maneka Gandhi v. Union of India (1978)*.

Preliminary Hearings:

Require magistrates to assess intent and context before trial.

Explanation: In ²⁸*Tejender Pal Singh (2024)*, the Rajasthan High Court emphasized that casual remarks do not warrant prosecution. This would filter out baseless cases.

Strengthening NHRC:

Empower the National Human Rights Commission to monitor wrongful prosecutions.

Explanation: The NHRC's role in custodial death cases shows its potential to provide redressal for Section 152 misuse.

5.6 Technological and Institutional Upgrades:**AI-Driven Tools:**

Deploy NLP tools to analyze digital content contextually.

²⁵ 1979 AIR 1369

²⁶ AIR 2012 SUPREME COURT 2653

²⁷ 1978 AIR 597

²⁸ Criminal Misc (Pet.) No. 5005/2024

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NLP (Natural Language Processing) tools are AI-powered systems that analyze and interpret human language in digital content. These tools help in understanding the meaning, sentiment, intent, and context of text, making them useful for law enforcement, content moderation, and legal analysis.

How NLP Tools Work:

- **Text Analysis** – Breaks down sentences, identifies words, and determines relationships between them.
- **Sentiment Detection** – Determines if a statement is positive, negative, neutral, or even threatening.
- **Context Recognition** – Differentiates between satire, opinion, and genuine threats (e.g., distinguishing memes from hate speech).
- **Named Entity Recognition (NER)** – Identifies key names, places, organizations, and dates in legal texts.
- **Topic Classification** – Categorizes text into relevant legal, political, or social topics.

Explanation: AI can distinguish satire (e.g., memes) from genuine threats, reducing false positives like the misuse of Section 152 of the BNS.

Independent Reviewer Model:

Appoint an authority (e.g., retired SC judge) to annually review Section 152's impact.

Explanation: The UK's Independent Reviewer of Terrorism Legislation provides transparency, ensuring laws balance security and rights.

5.7 Civil Society Engagement:

Periodic Consultations:

Involve NGOs and academia to document misuse and propose reforms.

Explanation: During the farmers' protests, civil society reports exposed arbitrary arrests. Their insights would ground reforms in reality.

6. Conclusion:

Section 152 of the BNS is indispensable for safeguarding national integrity, but its effectiveness depends on meticulous implementation. These recommendations aim to transform Section 152 into a precise, rights-respecting tool by addressing ambiguities, enhancing accountability, and institutionalizing safeguards. Rooted in constitutional principles and judicial wisdom, they ensure the provision protects national integrity without

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stifling democracy. International comparisons indicate that security laws must be carefully balanced with fundamental rights to prevent state overreach. Judicial precedents such as *Shreya Singhal* and *Kedar Nath Singh* provide a framework for balancing security and civil liberties. By adopting institutional reforms, improving police training, and leveraging technological advancements, India can prevent misuse and ensure that Section 152 serves its intended purpose without infringing on democratic rights. Future reforms should focus on greater accountability, international best practices in law enforcement, and technological modernization to ensure a just and effective criminal justice system.

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