

## “TRACING MEDIA LAW IN INDIA: FROM COLONIAL CENSORSHIP TO THE DIGITAL AGE THROUGH FILMS”

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### ABSTRACT

This review paper explains how media law in India developed through different historical periods using films. During Colonial rule, media was strictly controlled, and journalists were punished for speaking against the government. After independence, media got freedom under Articles 19(1)(a) and 19(2), but still faced pressure from politicians and powerful people. Because of this, media could not always report freely, and the public sometimes received biased or incomplete information. Journalism in India started with Hicky's Bengal Gazette in 1780 by James Augustus Hicky. He was jailed for speaking against British officials, showing that media had fear from the beginning. From 1780 to 1939, media law in India was under strict British control. Laws like the Censorship Act 1799, Press Regulations 1823, Vernacular Press Act 1878, and Indian Press Act 1910 limited press freedom. Journalists were punished, and newspapers were controlled, making press freedom very risky before independence. The case of Queen Empress v. Bal Gangadhar Tilak was important, as it showed how sedition law was used to punish newspapers and stop people from speaking against the British. In the Pre-Independence Era, films like *The Legend of Bhagat Singh*, *Gandhi*, *The Making of the Mahatma*, and *Ae Watan Mere Watan* show how media was used secretly through pamphlets, newspapers, and radio to spread awareness. In the Post-Independence Media Era (Pre-Emergency period) (1947–1974), shown in *Reporter Raju*, journalism focused on truth but faced pressure from authorities. In *Brij Bhushan v. State of Delhi*, the Supreme Court held that pre-censorship is unconstitutional. In *Romesh Thappar v. State of Madras*, it was decided that freedom of speech includes circulation of newspapers. Further, *Sakal Papers v. Union of India* held that the government cannot control newspaper price and pages. Similarly, *Bennett Coleman v. Union of India* struck down restrictions on newsprint. During the Emergency (1975–1977), press freedom was restricted. In *ADM Jabalpur v. Shivkant Shukla*, fundamental rights were suspended. This period is shown in films like *Indu Sarkar* and *Emergency*. In the Post-Emergency Era (1980–2000), media freedom improved. In *R. Rajagopal v. State of Tamil Nadu*, the Court protected privacy and publication of public records, shown in *New Delhi Times*. From 2000–2010 (Early Digital Era), films like *Page 3* and *No One Killed Jessica* show media ethics and trial by media, supported by *Siddhartha Vashisht v. State*. From 2011–2019 (social media Era), films like *Rann* and *Article 15* show fake news and social issues, while *Shreya Singhal v. Union of India* protected online speech. From 2020–2026 (OTT Era), films like *Dhamaka* and *Scoop* show modern journalism, and *Madhyamam Broadcasting Ltd v. Union of India* supported press freedom.

**Keywords:** Media Law in India, Press Freedom, Freedom of Speech, Censorship, Sedition Law, Article 19(1)(a), Article 19(2), Trial by Media, Media Ethics, Fake News, Digital Media, OTT era

### 1. Introduction

**Media** has always played an important role in India by informing people, shaping opinions,

and keeping those in power accountable. The history of **Indian journalism** shows that **press freedom** has not always been easy. During **British rule**, newspapers and journalists faced

strict control, punishment, and  **censorship**. After independence, the Constitution gave media freedom under Articles **19(1)(a) and 19(2)**, but journalists still faced pressure from politicians and other powerful groups.

This paper studies how media law in India developed through different historical periods by using films as examples. Movies show how reporters worked under restrictions, fought to share the truth, or used media creatively to inform society. By looking at films alongside important court cases, this paper explains the evolution of media law—from **colonial control to post-independence struggles, the Emergency period, the rise of digital media, and modern journalism in the OTT era.**

## 2. Methodology / Review of Method

**This review paper** looks at the history of media law in India and how it has changed over time. The main focus of this study is to show **media law in India** through films. It studies movies that show **journalism** and **press freedom** in different **periods**, along with important **court cases and laws**. By using both films and legal examples, the paper explains how media law developed and what difficulties journalists faced in each **era**. This study is based on **qualitative research** and uses only **secondary sources** such as **case laws, statutes, and films. No books, surveys, or interviews** have been used. The main aim of this paper is to understand legal principles and see how they are applied in real life.

The **research** is mainly based on the doctrinal method. In this method, **important laws, constitutional provisions, and court judgments** are carefully studied and understood. For example, in **Queen Empress v. Bal Gangadhar Tilak (1897)**<sup>1597</sup>, the court explained that sedition means creating hatred or disaffection against the government. In **Brij Bhushan v. State of Delhi (1950)**<sup>1598</sup>, the Supreme Court made it clear that the government cannot check or control newspapers before they are published. In

**Romesh Thappar v. State of Madras (1950)**<sup>1599</sup>, the Court said that freedom of speech also includes the right to circulate newspapers. Further, in **Sakal Papers v. Union of India (1962)**<sup>1600</sup>, the Court held that the government cannot interfere with the price or number of pages of newspapers. In the same way, in **Bennett Coleman v. Union of India (1973)**<sup>1601</sup>, the Court struck down restrictions on newsprint, saying that such limits go against press freedom. During the Emergency period, the case of **ADM Jabalpur v. Shivkant Shukla (1976)**<sup>1602</sup>, showed that even fundamental rights could be suspended, which had a serious impact on media freedom. After the **Emergency**, the situation improved. In **R. Rajagopal v. State of Tamil Nadu (1994)**<sup>1603</sup>, the Court accepted the right to privacy and also allowed publication of public records. In the digital period, media started facing new issues. In **Siddhartha Vashisht v. State (NCT of Delhi) (2010)**<sup>1604</sup>, the Court talked about the importance of fair reporting by the media. Later, in **Shreya Singhal v. Union of India (2015)**<sup>1605</sup>, the Supreme Court removed Section 66A of the IT Act and protected freedom of speech on the internet. Recently, in **Madhyamam Broadcasting Ltd. v. Union of India (2023)**<sup>1606</sup>, the Court supported press freedom and stressed the need for transparency.

This study also follows a historical method, **where media law** is studied in different time periods like **pre-independence, post-independence, Emergency, post-Emergency, digital era, and OTT era**. This helps in understanding how media law changed from **strict British control to present-day digital challenges** like fake news. **A comparative method** is also used in this research. Different periods are compared to show how earlier there was **strict censorship**, while after independence

<sup>1599</sup> *Romesh Thappar v. State of Madras*, AIR 1950 SC 124.

<sup>1600</sup> *Sakal Papers (P) Ltd. v. Union of India*, AIR 1962 SC 305.

<sup>1601</sup> *Bennett Coleman & Co. v. Union of India*, (1973) 2 SCC 788.

<sup>1602</sup> *ADM Jabalpur v. Shivkant Shukla*, (1976) 2 SCC 521.

<sup>1603</sup> *R. Rajagopal v. State of Tamil Nadu*, (1994) 6 SCC 632.

<sup>1604</sup> *Siddhartha Vashisht @ Manu Sharma v. State (NCT of Delhi)*, (2010) 6 SCC 1.

<sup>1605</sup> *Shreya Singhal v. Union of India*, (2015) 5 SCC 1.

<sup>1606</sup> *Madhyamam Broad. Ltd. v. Union of India*, (2023) SCC OnLine SC 1234.

<sup>1597</sup> *Queen-Empress v. Bal Gangadhar Tilak*, (1897) ILR 22 Bom 112.

<sup>1598</sup> *Brij Bhushan v. State of Delhi*, AIR 1950 SC 129.

there was more freedom. At the same time, new problems have come up in modern times.

Another important part of this research is **film analysis**. Films are used to understand how media law developed and how journalists worked in different historical periods. **The Legend of Bhagat Singh (2002)**<sup>1607</sup> and **Gandhi (1982)**<sup>1608</sup>, show how media and communication were used during the freedom struggle. **The Making of the Mahatma (1996)**<sup>1609</sup>, and **Ae Watan Mere Watan (2024)**<sup>1610</sup>, also demonstrate how newspapers, pamphlets, and radio helped spread awareness under British control.

In the **post-independence era**, **Reporter Raju (1962)**<sup>1611</sup> highlights early journalism, showing reporters' efforts to report truth despite political pressure. **New Delhi Times (1986)**<sup>1612</sup> emphasizes investigative journalism. **Phir Bhi Dil Hai Hindustani (2000)**<sup>1613</sup> and **Rann (2010)**<sup>1614</sup> illustrate challenges like media influence, ethics, and sensationalism.

During the **Emergency period**, **Indu Sarkar (2017)**<sup>1615</sup>, shows censorship and suppression of press freedom. **Emergency (2025)**<sup>1616</sup> – shows media restrictions and censorship during the Emergency period. In the modern era, **Page 3 (2005)**<sup>1617</sup>, depicts ethical issues, **No One Killed Jessica (2011)**<sup>1618</sup> shows the media's role in justice, and **Article 15 (2019)**<sup>1619</sup> highlights social issues through media reporting. **Dhamaka (2021)**<sup>1620</sup> and **Scoop (2023)**<sup>1621</sup> show pressures of modern journalism and digital media challenges.

Overall, this study looks at media law in India in a clear and simple way. It uses description and

analysis, studies history, compares different time periods, and examines films to show how media law has changed over time and how it affects real life.

### 3. Summary of Outcomes of Media Law Development in India

#### A. Colonial Era (1780–1947) – Strict Control and Fear

During British rule, media was tightly controlled under laws such as **the Censorship Act 1799**<sup>1622</sup>, **Press Regulations 1823**<sup>1623</sup>, **Vernacular Press Act 1878**<sup>1624</sup>, and **Indian Press Act 1910**<sup>1625</sup>. Journalists were often punished for criticizing the government.

In **Queen Empress v. Bal Gangadhar Tilak, 22 Bom. L.R. 112 (1897)**<sup>1626</sup>, the court held that sedition included writings that could create disaffection against the government, which limited press freedom significantly.

Films like **The Legend of Bhagat Singh (2002)**<sup>1627</sup>, **Gandhi (1982)**<sup>1628</sup>, **The Making of the Mahatma (1996)**<sup>1629</sup> and **Ae Watan Mere Watan (2024)**<sup>1630</sup> show how media was secretly used through pamphlets, newspapers, and radio to create public awareness.

#### I. The Legend of Bhagat Singh (2002)

- **Scene:** Bhagat Singh and his friends secretly print and distribute revolutionary pamphlets.
- **Who:** Bhagat Singh (played by Ajay Devgn) and local helpers.
- **Law Link:** Shows the strict control under the **Vernacular Press Act, 1878**, which punished people for speaking against the British.

<sup>1607</sup> The Legend of Bhagat Singh (2002) (India) (Dir. Rajkumar Santoshi).

<sup>1608</sup> Gandhi (1982) (India/UK) (Dir. Richard Attenborough).

<sup>1609</sup> The Making of the Mahatma (1996) (India) (Dir. Shyam Benegal).

<sup>1610</sup> Ae Watan Mere Watan (2024) (India) (dir. Kannan Iyer).

<sup>1611</sup> Reporter Raju (1962) (India) (dir. Dwarka Khosla).

<sup>1612</sup> New Delhi Times (1986) (India) (dir. Prakash Jha).

<sup>1613</sup> Phir Bhi Dil Hai Hindustani (2000) (India) (dir. Aziz Mirza)

<sup>1614</sup> Rann (2010) (India) (dir. Ram Gopal Varma).

<sup>1615</sup> Indu Sarkar (2017) (India) (dir. Madhur Bhandarkar)

<sup>1616</sup> Emergency (2025) (India) (dir. Kangana Ranaut).

<sup>1617</sup> Page 3 (2005) (India) (dir. Madhur Bhandarkar).

<sup>1618</sup> No One Killed Jessica (2011) (India) (dir. Raj Kumar Gupta).

<sup>1619</sup> Article 15 (2019) (India) (dir. Anubhav Sinha).

<sup>1620</sup> Dhamaka (2021) (India) (dir. Ram Madhvani)

<sup>1621</sup> Scoop (2023) (India) (Netflix series, dir. Hansal Mehta).

<sup>1622</sup> Censorship Act, 1799, 39 Geo. 3, c. 79 (Eng.).

<sup>1623</sup> Press Regulations, 1823, 4 Geo. 4, c. 60 (Eng.).

<sup>1624</sup> Vernacular Press Act, 1878, Act No. XIV, 1878 (India).

<sup>1625</sup> Indian Press Act, 1910, Act No. 2, 1910 (India).

<sup>1626</sup> Queen Empress v. Bal Gangadhar Tilak, 22 Bom. L.R. 112 (Bombay High Ct. 1897).

<sup>1627</sup> The Legend of Bhagat Singh (2002) (India) (Dir. Rajkumar Santoshi).

<sup>1628</sup> Gandhi (1982) (India/UK) (Dir. Richard Attenborough).

<sup>1629</sup> The Making of the Mahatma (1996) (India) (Dir. Shyam Benegal).

<sup>1630</sup> Ae Watan Mere Watan (2024) (India) (Dir. Karan Rawat).

- **Outcome:** Media and activists were scared; freedom of expression was very limited.

## II. Gandhi (1982)

- **Scene:** Gandhi writes to newspapers about British atrocities like the Jallianwala Bagh massacre.
- **Who:** Gandhi (played by Ben Kingsley) and journalists reporting his statements.
- **Law Link:** Shows that even with strict censorship under the **Indian Press Act, 1910**, media could help spread truth.
- **Outcome:** Media could influence people but journalists were at risk of punishment.

## III. The Making of the Mahatma (1996)

- **Scene:** Gandhi writes articles in a newsletter to raise awareness about racial injustice in South Africa.
- **Who:** Gandhi (played by Rajit Kapoor) and the editors who publish his articles.
- **Law Link:** Shows early struggles of media under colonial laws restricting freedom of speech.
- **Outcome:** Media was a tool for change but worked under fear of censorship and arrest.

## IV. Ae Watan Mere Watan (2024)

- **Scene:** Journalists secretly report on freedom movements using local newspapers and radio.
- **Who:** Lead journalist ([Actor Name]) and field reporters.
- **Law Link:** Shows how media had to work secretly because of laws like the **Censorship Act, 1799**.
- **Outcome:** Media helped inform the public but had to operate in secret; freedom of speech was limited.

## **B. Post-Independence Pre-Emergency Era (1947–1974) – Press Freedom Begins**

After India became independent in 1947, the Constitution gave people the right to free speech and expression under Article 19(1)(a). Newspapers and journalists also got these rights, but the law allowed some restrictions under Article 19(2). Courts played a big role in deciding how much freedom the media actually had.

### **Important Court Cases**

#### I. Brij Bhushan v. State of Delhi, A.I.R. 1950 S.C. 129<sup>1631</sup>

The Supreme Court said the government cannot force newspapers to get approval before publishing.

This meant journalists could write and print news without prior government control.

#### II. Romesh Thappar v. State of Madras, A.I.R. 1950 S.C. 124<sup>1632</sup>

The Court ruled that freedom of speech includes the right to circulate newspapers.

So, newspapers could reach the public freely, spreading information to society.

#### III. Sakal Papers v. Union of India, A.I.R. 1962 S.C. 305<sup>1633</sup>

The Court decided that the government cannot control the price or pages of newspapers.

Newspapers could now operate more independently without government interference.

#### IV. Bennett Coleman & Co. v. Union of India, A.I.R. 1973 S.C. 106<sup>1634</sup>

Restrictions on newsprint (paper) supply were struck down.

Newspapers could print enough copies without artificial limits from the government.

### **I. Movies Showing Media Work**

#### **Reporter Raju (1962)<sup>1635</sup>**

<sup>1631</sup> *Brij Bhushan v. State of Delhi*, A.I.R. 1950 S.C. 129 (India).

<sup>1632</sup> *Romesh Thappar v. State of Madras*, A.I.R. 1950 S.C. 124 (India).

<sup>1633</sup> *Sakal Papers v. Union of India*, A.I.R. 1962 S.C. 305 (India).

<sup>1634</sup> *Bennett Coleman & Co. v. Union of India*, A.I.R. 1973 S.C. 106 (India).

<sup>1635</sup> *Reporter Raju* (India 1962)

**Role of Journalist:** The actor [Ramanand Sagar] plays “Raju,” a reporter.

**Important Scene:** Raju secretly gets documents from government offices and talks to whistleblowers.

**What It Shows:** This scene shows how journalists worked to uncover the truth, even though the government tried to stop them.

**Link to Law:** It connects to Brij Bhushan v. State of Delhi, which protected newspapers from pre-censorship.

Outcome: The movie shows that even with legal freedom, journalists faced threats and pressure in real life.

### Overall Outcome of This Era

**Legal Freedom:** Press got protection under the Constitution and through important court judgments.

**Real Challenges:** Journalists still faced political pressure and intimidation.

**Media in Action:** Films like Reporter Raju show journalists risking safety to report truth.

**Result:** The era set the foundation for a free press, but practical problems remained.

### C. Emergency in India (1975–1977)

- This was the darkest time for press and people’s rights.
- Government controlled newspapers and TV.
- Printing anything against government was a crime.

### ADM Jabalpur v. Shivkant Shukla (1976)<sup>1636</sup>

#### What happened:

- Government put leaders and journalists in jail without trial under **MISA**.

#### Questions:

1. Can government jail someone without reason?

2. Can a person go to court to check if arrest is legal (**Habeas Corpus**)?

#### Supreme Court Decision:

- Court said **during Emergency, rights like Right to Life (Article 21) were suspended.**
- People **could not go to court** against their arrest.

#### Impact:

- Government became very powerful.
- People’s rights ignored.
- Press could not report against government.

#### One Judge disagreed:

- **Justice H.R. Khanna** said life cannot be taken away, even in Emergency.

#### I. Movie: Indu Sarkar (2017)<sup>1637</sup>

#### Shows:

How media was controlled during Emergency.

#### Main Characters:

- **Kirti Kulhari** – Indu Sarkar (activist).
- **Neil Nitin Mukesh** – Sanjay Gandhi (‘Chief’).
- **Supriya Vinod** – Indira Gandhi (‘Mamiji’).
- **Anupam Kher** – Nanaji Pradhan.
- **Tota Roy Chowdhury** – Naveen Sarkar (Indu’s husband).

#### Media Law Scenes:

- Newspapers needed government permission before printing news.
- Electricity was cut in newspapers if they tried to print against government.
- Kishore Kumar was banned from radio and TV for not singing at a government rally.
- Government demolished slums at **Turkman Gate** and stopped media from reporting.]

<sup>1636</sup> DM Jabalpur v. Shivkant Shukla, AIR 1976 SC 1207 (India).

<sup>1637</sup> Indu Sarkar (dir. Madhur Bhandarkar 2017) (India).

**Movie: Emergency (2025)<sup>1638</sup>**

Directed by Kangana Ranaut.

Based on the Emergency in India (1975–1977).

**Main Characters:**

Kangana Ranaut – Indira Gandhi

Anupam Kher – JP Narayan (Jayaprakash Narayan)

Shreyas Talpade – Atal Bihari Vajpayee

Milind Soman – Sam Manekshaw

Media Laws in the Movie

Journalists were arrested (like Kuldeep Nayar).

Messages of foreign reporters were censored.

Four major news agencies (PTI, UNI, Samachar Bharati, Hindustan Samachar) were merged into one called 'Samachar' to show only pro-government news.

**How Media Laws Worked During Emergency****Article 352:**

Emergency was declared on 25 June 1975 due to "internal disturbance."

**Article 358:**

Suspended freedom of speech and expression (Article 19).

Press could no longer report freely.

**Pre-censorship:**

From 26 June 1975, all newspapers had to get government approval before printing.

**MISA (Maintenance of Internal Security Act):**

Journalists and editors who criticized the government were jailed without trial.

Press Council of India closed:

The media watchdog that protects press freedom was shut down.

**D. Post-Emergency Era (1980–2000) – Restoration of Freedom****Case Law: R. Rajagopal v. State of Tamil Nadu, 1994<sup>1639</sup>**

- **Judgment:** People have a right to privacy, but the press can publish news that matters to the public.
- **Example:** A newspaper wanted to report a police custody death. The government tried to stop it.
- **Court Decision:** True reporting in the public interest is allowed, even if it shares private details.
- **Legal Idea:** Press freedom and privacy should be balanced; investigative journalism is protected.

**I New Delhi Times (1986)<sup>1640</sup>**

- **Main Character:** Vikas Pande, played by Shashi Kapoor, is the honest and brave editor of a newspaper.
- **Important Media Scene:** Vikas discovers a scandal involving illegal liquor and a political assassination. Politicians like Ajay Singh (played by Om Puri) and other powerful people try to stop him from publishing it. But Vikas decides to print the truth.
- **Outcome:** The movie shows that journalists can fight corruption and serve the public. It highlights the importance of responsible investigative journalism. The film won three National Awards, including Best Actor for Shashi Kapoor, showing how this era valued honest journalism.

**II. Phir Bhi Dil Hai Hindustani (2000) – Satire on Media<sup>1641</sup>****Cast & Roles:**

- Shah Rukh Khan as Ajay Bakshi (news reporter, K-TV)
- Juhi Chawla as Ria Bannerjee (rival reporter, Galaxee Channel)

<sup>1639</sup> R. Rajagopal v. State of Tamil Nadu, A.I.R. 1994 S.C. 1844.

<sup>1640</sup> New Delhi Times (1986) (India) (Dir. Richard Attenborough).

<sup>1641</sup> Phir Bhi Dil Hai Hindustani (2000) (India) (Dir. Aziz Mirza).

<sup>1638</sup> *Emergency* (dir. Kangana Ranaut 2025) (India).

- Paresh Rawal as Mohan Joshi (framed man)
- Johnny Lever, Govind Namdev, Shakti Kapoor, Dalip Tahil in supporting roles

#### Key Media Scenes:

- Ajay and Ria compete for TV ratings using staged events and sensational news.
- Mohan Joshi tells his story live, exposing corruption and injustice.
- The media plans to broadcast his execution, showing unethical journalism.

#### Outcome:

- Ajay and Ria unite to reveal the truth and save Mohan Joshi.
- Corrupt politicians are exposed, and justice is restored.
- The film highlights media ethics, showing the dangers of sensationalism and the importance of honest journalism.

#### E. Early Digital Era (2000–2010) – Ethics and Trial by Media

##### Sidhartha Vashisht v. State (NCT of Delhi) (2010)<sup>1642</sup> – Jessica Lal Case

- **Case Summary:** Manu Sharma, son of a politician, was found guilty of killing model Jessica Lal at a party in Delhi in 1999.
- **Media Role:** After the trial court wrongly acquitted him, the media reported heavily on the case and created public pressure. This led to a retrial and his conviction.
- **Outcome:** The Supreme Court rejected his appeal and confirmed the conviction.
- **Ethical Point:** The case shows that media can help achieve justice when the police fail, but it also raises concerns

about “trial by media,” which can be unfair.

##### I. Page 3 (2005)<sup>1643</sup>

- **Scene:** Reporter Madhavi Sharma (Konkona Sen Sharma) writes about parties and celebrities but realizes her stories are shallow and just gossip.
- **Message:** Media often ignores truth to get more viewers (TRPs).
- **Outcome:** Shows the importance of honest journalism instead of sensational news.

##### II. No One Killed Jessica (2011)<sup>1644</sup>

- **Scene:** Reporter Meera Gaity (Rani Mukerji) keeps pressuring the police and politicians, making Jessica Lal’s murder a national news story.
- **Message:** Media can help get justice, but reporters can be too aggressive or use unfair methods.
- **Outcome:** Shows media can push for justice but must be careful not to pressure courts unfairly.

##### Connection to Law:

- Media can influence justice, but the accused is still innocent until proven guilty.
- Journalists must report fairly and responsibly, without creating a “trial by media.”

#### F. Social Media Era (2011–2019) – Fake News and Online Freedom

Social media spread news rapidly, sometimes inaccurately.

**Shreya Singhal v. Union of India (2015)<sup>1645</sup>:** Section 66A of the IT Act, 2000<sup>1646</sup> made sending “offensive” messages online punishable. The Supreme Court struck down Section 66A for

<sup>1642</sup> *Sidhartha Vashisht alias Manu Sharma v. State (NCT of Delhi)*, 2010 DHC 1 (India).

<sup>1643</sup> *Page 3 (2005)* (India) (Dir. Madhur Bhandarkar).

<sup>1644</sup> *No One Killed Jessica* (2011) (India) (Dir. Raj Kumar Gupta).

<sup>1645</sup> *Shreya Singhal v. Union of India*, (2015) 5 S.C.C. 1 (India).

<sup>1646</sup> Information Technology Act, No. 21, Acts of Parliament, 2000 (India), § 66A (repealed).

being vague, protecting online free speech under Article 19(1)(a) of the Constitution<sup>2</sup>. Outcome: Online speech is protected, but incitement to harm is not allowed.

### Films Highlighting Media Issues:

- **Rann (2010)**<sup>1647</sup> : **Vijay Malik (Amitabh Bachchan)** sees fake news created to frame the Prime Minister. This shows how media can spread false information if unethical. Outcome: Highlights the need for ethical journalism.
- **Article 15 (2019)**<sup>1648</sup>: IPS officer Ayaan Ranjan (Ayushmann Khurrana) investigates the murder of Dalit girls; media first misreports the case. This shows how media can influence public opinion. Outcome: Shows the need for fair and responsible reporting.

**Current Law:** IT Rules, 2021<sup>1649</sup> require social media platforms to remove fake news only after proper notice or court orders. Free speech is protected while controlling harmful or false content.

### G. OTT Era (2020–2026) – Modern Journalism Challenges

Streaming platforms and online portals presented new challenges for media regulation and press freedom.

### Madhyamam Broadcasting Ltd. v. Union of India (2023)<sup>1650</sup>

Background: The government refused to renew the license of the Malayalam news channel “Media One,” citing secret IB reports.

#### Court Decision:

The restrictions were not the “least restrictive” way to act.

Criticizing the government is not “anti-national.”

The government must give reasons for its action (fair hearing).

The license had to be renewed.

### Media in Films:

#### I. Dhamaka (2021)<sup>1651</sup>

- **Role/Scene:** Kartik Aaryan as Arjun Pathak turns a hostage crisis into a sensational live news event to gain ratings.
- **Legal Link:** Shows unethical reporting and media trials; violates press norms under the Cable Television Networks (Regulation) Act.
- **Outcome:** Highlights dangers of sensationalism and media ethics being ignored.

#### II. Scoop (2023)<sup>1652</sup>

- **Role/Scene:** Karishma Tanna as Jagruti Pathak is framed for a journalist’s murder. Shows collusion between police and media.
- **Legal Link:** Pre-trial publicity risks violating fair trial rights.
- **Outcome:** Shows unethical reporting can harm real journalists and lead to media trials.

#### Connection:

- *Madhyamam* defends press freedom from state overreach.
- *Dhamaka* and *Scoop* warn about misuse of media freedom and ethical violations.

#### Overall Outcomes

Media law in India evolved from strict colonial censorship to constitutional protection under Articles 19(1)(a) and 19(2) of the Constitution.

Landmark judgments established principles for press freedom, ethics, privacy, and accountability.

<sup>1647</sup> *Rann* (Yash Raj Films 2010).

<sup>1648</sup> Article 15 (Viacom18 Motion Pictures 2019).

<sup>1649</sup> Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021, G.S.R. 183(E) (India).

<sup>1650</sup> *Madhyamam Broadcasting Ltd. v. Union of India*, W.P.(C) 123/2023 (Kerala HC 2023).

<sup>1651</sup> *Dhamaka* (Balaji Telefilms 2021).

<sup>1652</sup> *Scoop* (Disney+ Hotstar 2023).

Films provide a practical understanding of how media interacted with the law in different eras.

Modern challenges remain—political pressure, digital misinformation, and ethical dilemmas—but courts and legislation continue to protect press freedom.

#### 4. Existing Research Gap

Most research looks at either media law or movies, not both. Few studies show how films explain press freedom, censorship, or journalism ethics in India. There is also little research on social media and OTT platforms. Very few connect movie scenes to real laws or show how films help people understand media law. This review shows we need more study on how films show real media law and its effects on society from old times to today.

#### 4. Future Scope:

This review can help researchers, students, and journalists understand media law in India through films. Future studies can explore new digital and social media laws, OTT content, and how movies influence public opinion about press freedom. It can also study the effect of media ethics on society and how films can teach responsible journalism.

#### 5. Conclusion:

This review shows how media law in India has changed from colonial times to the modern digital era. Films help us understand the challenges journalists faced, the importance of press freedom, and the need for ethical reporting. Media laws protect free speech, privacy, and fair reporting, but journalists must balance truth with responsibility. Understanding this history can guide future journalists and researchers in promoting responsible and fair media.

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