



Judicial Accountability In India: Flaws And Road Ahead

NAME: RASHI LAVANIYA

ABSTRACT:

The judicial system is a crucial tool for defending and defending citizens' rights in a democracy. It is imperative that this arm of government be autonomous in its operations in addition to having a judiciary in place. To ensure fairness in the decision-making process, independence is necessary. The public is unable to see sensible justice if the decision-making process lacks impartiality. Judges must be independent, but they must also be accountable and transparent. Justice will be a mirage for the public if there is a lack of judicial independence, accountability, and transparency. One of a democratic system's most crucial goals is justice. In law, justice is a primary objective. For any democratic system to thrive, justice is crucial because when the public is treated unfairly, it eventually causes discontent, disenchantment with the government or ruler, and rebellion against the state. The accountability of judges for their job cannot be separated from judicial independence. Because they are human, judges are subject to human fallibility. Judges must be subject to the institutional oversight system. Adopting an appropriate system for accountability and transparency is the goal of judicial independence.

KEYWORD: Justice, Good Governance, Indian Judiciary Transparency, Accountability, judiciary

1.INTRODUCTION:

It is common knowledge that one of the most significant branches of the government is the court. It is crucial to the nation's government and the administration of justice. The Indian court has received recognition for actively advancing good governance in the country, but it faces numerous obstacles to the public's actual adoption of good governance. The administrative operations of India's judicial system, including the selection of judges, lack openness. One of the most surprising events in Indian judicial history occurred on January 12, 2018, when four of the Supreme Court's senior judges called a press conference to express their displeasure with the court's unfair administrative operations. They told the media that this nation's democracy would not endure if the judiciary was not maintained as an institution.

Our founding fathers and the framers of the Constitution gave the court a great deal of authority to safeguard civil freedoms and the Constitution itself, but they did not establish a particularly strong system for holding the judiciary accountable. One of the most significant human rights guaranteed by the Constitution is justice. Judicial delinquency in all its manifestations is on the rise. The primary element of power bestowed in public authority is trust and fiduciary. Trusteeship and accountability go hand in hand, and the most crucial element in this context is ongoing social auditing and monitoring. The parliament, in turn, has been held accountable to the people, and the executive branch is answerable to them. The judiciary has theoretically been held accountable to the Parliament within the Constitutional framework. Since the judiciary is one of democracy's most crucial pillars, it must be governed by democratic principles. Should democratic ideals not be applied to any branch of government, it might become unmanageable and unaccountable. In order to preserve the public's trust, confidence, and prestige in the court, it is imperative that the judiciary's operations be transparent and responsible. According to a scholar, judicial accountability has three main benefits:

1. It promotes the rule of law;
2. It fosters public confidence in judges; and
3. It fosters institutional responsibility.

The founding fathers of the Constitution believed that established norms and peer pressure would serve as sufficient checks on the judiciary, but this has not happened. The Supreme Court has correctly noted that a single dishonest judge not only disgracefully conducts himself and his office, but also jeopardizes the integrity of the entire judicial system. Judicial accountability can help to advance and facilitate the accountability process. The judicial system must be held accountable to the law in order to attain judicial accountability.

REVIEW OF LITERATURE:

The topic of judicial transparency and accountability in India has been the subject of numerous scholarly publications. Scholars of law like Sudhir Krishnaswamy, who examined the effects of a lack of openness on the administration of justice, and Upendra Baxi, who highlighted the necessity of an accountable judiciary, have made noteworthy contributions. The effectiveness of the collegium process in selecting judges and the influence of seminal rulings on public opinion have also been the subject of recent research. a thorough analysis of the body of research indicates that opinions on the judicial accountability of judges in India are divided. While some scholars, like Gautam Bhatia, have drawn attention to the limits resulting from the absence of enforceable processes, others, like A. R. N. Prasad, have emphasized the importance of constitutional clauses in guaranteeing judicial responsibility.

Furthermore, the difficult relationship between judicial independence and accountability has been demonstrated by rulings of the SC like K. Veeramani v. Union of India¹ & K. P. Verma v. Union of India²

1.2. STATEMENT OF PROBLEM

Even though there are numerous systems in place to guarantee accountability, the Indian legal system nevertheless confronts a number of difficulties, such as:

- Widespread ignorance about the role of the judiciary.
- Inadequate procedures for handling complaints of wrongdoing by judges.
- The Collegium system's seeming opacity.
- Concerns about the standard of justice administered are growing

1.3. HYPOTHESIS:

The study aims towards improving judicial transparency and accountability in India, which will boost public trust & confidence on the judiciary, and that would ultimately result in better and reliable court decisions

1.4. RESEARCH OBJECTIVES:

- a) To examine the contemporary judicial accountability and transparency scenario in India.
- b) To understand the necessity of Collegium in judicial appointments and transfers.
- c) To enumerate the existing lacunas in judicial accountability mechanism.
- d) To recommend practical reforms towards judicial accountability and transparency.

1.5. RESEARCH QUESTION:

1. What are the currently available mechanisms in India for judicial accountability and transparency?
2. What are the weaknesses of the current system of judicial accountability?
3. The needed changes to promote judicial accountability and transparency

¹ 1991 SCR (3) 189, 1991 SCC (3) 655, AIR ONLINE 1991 SC 184

² AIR 1992 SUPREME COURT 2219, 1992 (4) SCC 506,

1.6. RESEARCH METHODOLOGY:

This research will utilize a approach of mixed-methods which includes:

1. Qualitative analysis of judicial precedents and their implications.
2. Surveys and interview to try to understand the public perception concerning the accountability and transparency of the judiciary.
3. Literature Review, policy documents, and academic articles.

1.7. SCOPE OR LIMITATION OF STUDY:

Although this study endeavours to provide a comprehensive overview of judicial accountability & transparency within the Indian judiciary, it shall orient much of its discussion towards the SC & HC referring less often to courts lower down the hierarchy mainly because of the complexity of context. It is also because the framework of law keeps changing with the changing nature of society, and recommendations may need to be revisited after a few years.

2. MEANING & CONCEPT OF JUDICIAL ACCOUNTABILITY:

"Responsible for your decisions or conduct & obligated to provide an explanation for them when asked" is what accountability means. According to Webster's definition, Accountability is the state or attribute of being liable, responsible, or accountable.³ Accountability generally entails the need to defend or explain one's prior actions, behaviour, or conduct. Accordingly, the term "accountability" refers to accountability for the authority, responsibilities, and tasks that are delegated to an individual. By holding judges legally or politically accountable for their actions, judicial accountability holds them accountable. Accountability is simply accepting responsibility for one's own actions, decisions, or behaviours and being answerable to a third party. It is focused on the calibre of justice, the conduct and demeanour of judges, and the qualitative work. It places a strong emphasis on judges' total integrity, which is a fundamental component of the justice system. Unquestionable justice, impartiality, and honesty are essential for the judiciary to operate effectively. In the NJAC case, Justice J. Chelameswar noted that a judge's efficiency and ability to make decisions fast are mostly determined by his profound legal knowledge, sharp and alert intellect that allows

³ Merriam webster (Est. 1828)

him to swiftly grasp the disagreement, and enthusiasm and dedication to solving the problem. However, unless the litigants feel that the judge is completely fair and impartial, a judge who possesses all of the aforementioned attributes need not be able to inspire confidence in them. The judiciary serves as the guardian of the Constitution and its core principles. In democracies, it is also seen as the vital component of constitutionalism. People want courts to make decisions on their issues in a timely manner. People will become more confident as a result. The question now is what the formula is and what characteristics a judge must possess in order to provide a decision swiftly and inspire confidence in the litigants and the general public. An essential component of constitutional governance is transparency. It is well known that constitutionalism requires reason in all aspects of state activity. It could be either the appointment process or the justice delivery system. It falls into three categories while maintaining the idea of judicial independence and accountability. Behavioural responsibility comes in third, followed by political accountability and decisional accountability. Political accountability includes the appointment and selection of judges as well as their term in office. Decisional accountability pertains to the process by which judges are held responsible for their rulings and decisions. Academic criticism of judicial actions, appeals, and the concept of judicial review are all components of decisional accountability. Legislators don't provide the courts enough money to operate effectively. It unquestionably has a negative impact on the court's decision-making procedure. The behaviour of judges is a component of behavioural accountability. One component of rationality is openness. The appointment procedure must be transparent. In our nation, the selection procedure through the Collegium system is completely opaque and closed to the general public. As noted by Ruma Pal, J., "In the Collegium, consensus is sometimes reached through a trade-off that results in questionable appointments with disastrous consequences for the litigants and the credibility of the judicial system." The system's increasing use of "lobbying" and sweet talk has also undermined institutional independence. The Supreme Court has noted in relation to legal proceedings that "open court public trials are unquestionably essential for the healthy, objective, and fair administration of justice." A court trial that is open to the public's observation and scrutiny acts as a natural check on the whims of the judiciary and is a potent tool for fostering public trust in the impartiality, fairness, and objectivity of the administration of justice. The public's trust in the administration of justice is so important that there is no room for disagreement on the general rule that courts, in their capacity as judicial tribunals, must typically hear cases in public & allow the public access to the courtroom. According to Jeremy Bentham, "Sinister interest, and evil in every shape, has full swing in the darkness of secrecy." ⁴The very essence of justice is publicity. It is the strongest motivator for effort and the most reliable defence against improbability. In the sense that the security of securities is publicity, it keeps the judge himself during the trial.

⁴ The virtues of openness were discussed by the Supreme Court of Canada in *A.G. Nova Scotia v. MacIntyre* which quoted eighteenth-century philosopher Jeremy Bentham:

2.1. NEED OF JUDICIAL ACCOUNTABILITY:

Power in a "Democratic republic" must be accountable to the person using it in order for the system to remain intact. Politicians should not be the only ones held accountable; judges and bureaucrats should also be included. and power is given to all individuals. Position and authority in a Democracy entails accountability, and all public positions must continue to continually answerable to the people, who hold the political sovereignty. The judicial system handles the administration of justice through the courts' agency. The people who run the courts are called judges. They are not just outward representations of courts; they are living, breathing representatives. The way judges carry out their responsibilities affects the courts' reputation and the legitimacy of the legal system. Since ancient times, judges have been highly esteemed in India. However, people are gradually losing faith in the judiciary and taking matters into their own hands as a result of some terrible incidents in recent years. It is really abhorrent. Since the court must serve as the custodian of our constitution, it is necessary to hold it accountable because it is more expensive to violate its ideals than any other branch of government. The idea of judicial responsibility and judges' answerability is not new. A number of nations have provisions in their constitutions to guarantee the judiciary's accountability. Its goal is to keep power from being concentrated in the hands of one branch of government, particularly in nations like India where it is alleged that judicial activism encroaches on the territory of other branches. However, independent judiciary is a prerequisite for all judges, as their oath of office instructs them to enforce the nation's laws and constitution and to operate without fear, favour, or malice. Former CJI of India, Hon. Justice S.H. Kapadia said: "When we discuss ethics, judges typically make comments about ethics among professors, students, politicians, and others. But in my opinion, ethics—not just constitutional morality, but also ethical morality—should serve as the foundation for judges as well. Renowned legal experts such as former Hon. CJI S. Venkataramaiah, former Supreme Court Judge D.A. Desai, and another former Supreme Court Judge Chennappa Reddy have stated that if all societal segments are held responsible for their actions, then there is no reason why judges shouldn't be held accountable as well. The veracity of this plea was acknowledged by the former Hon. Chief Justice Verma, who once said, "These days, we judges are constantly telling others what they should do, but who is going to tell us? The job of upholding the law is ours, but it does not absolve us of its application. Judges must adhere to a code of conduct, which is generally referred to as ethics for judges, in order for this idea of judicial responsibility to be properly implemented."⁵

⁵ Banerji, oishika, 2021, https://blog.ipleaders.in/need-stronger-judicial-accountability/#Landmark_judgments

2.2. INCIDENTS WHICH QUESTIONED THE JUDICIARY:

Members of the judiciary themselves attempt to separate the judiciary from two state organs. There are several examples where the public's trust in the judiciary's ability to function has been undermined. As has already established, the Collegium system's process for appointing judges is opaque and opaque. The public in a democratic society has a right to know how all of the government's organs are operating. In spite of this, the judicial system has created the idea of a sealed envelope, under which the court asserts its inherent right to keep the results of some delicate investigations secret in the public good. While serving as chief justice of the Punjab High Court in 1991, Justice Ramaswamy was accused of embezzling the money. Parliament began the process of impeachment against him in 1992. Justice V. Ramaswamy was found guilty by an investigative commission of intentional and egregious abuses of power and moral turpitude by utilizing public funds for private gain. objectives and careless disregard for statutory regulations. According to the constitutional mandate, a two-thirds majority in the parliament was needed to approve a motion for removal. The resolution was unable to receive parliamentary approval because the Congress party abstained from voting. In the Prasad Medical case, it was claimed that retired Justice Qudusi and BP Yadav, the chairman of the Prasad Educational Trust, illegally rewarded Justice S.N. Shukla for receiving a favourable order. On December 4, 2019, the CBI filed a formal complaint against Justice SN Shukla after receiving approval from the then-Chief Justice of India. Once more, a permanent female Supreme Court employee lost her job, and her family members were also let go. She accused the then Chief Justice of India of sexual harassment. On Saturday, a unique hearing was held without a petition being filed. Regarding the independence of the judiciary, it was deemed a subject of considerable public concern. The attorney general suggested that an outside committee be established. The Chief Justice of India established a committee of judges in defiance of this instruction.⁶

3. APPOINTMENT & TRANSFER OF JUDGES & FUNCTIONING OF COLLEGIUM SYSTEM:

According to the Constitutional Scheme, the President of India must contact the Chief Justice of India before appointing judges to the Supreme Court of India and High Courts. The Supreme Court of India created and implemented the Collegium system. Its primary duty is to advice and counsel the president of India on the selection of Supreme Court and High Court justices as well as the transfer of judges among the various High Courts⁷. Protecting and preserving the division of powers among the three branches of government is the main advantage this system offers our nation. It guarantees that neither the Legislature nor the Executive can compromise the judiciary's independence. According to Justice Sathasivam, the Collegium System has grown somewhat more transparent, and since it requires wide-ranging consultation, it will be most

⁶ Garg, Ashutosh, 2021, pg.no, 82<https://doi.org/10.69974/gslawjournal.v3i2.51>

⁷ www.latestlaw.com

appropriate for the nomination of judges. Additionally, he stated that "as judges, we are aware of the qualifications and character of those who are being considered for appointment as judges to the Supreme Court and High Courts." His answer makes it apparent that it would be challenging for those not involved in the day-to-day operations of the courts to narrow down the top candidates for the necessary job. The current Collegium System more thoroughly examines the shortlisted applicants for the attributes required of a judge in the Supreme Court or the High Court than the Judicial Appointment Commission (JAC). Since its inception, the Collegium system's practice has been criticized for its lack of transparency in the appointment of justices. The Supreme Court ruled in *Anjali Bhardwaj v. Union of India* that the justifications for the appointment of the Public Relations Officers must be made public. Nonetheless, the justifications for the selection of Supreme Court and High Court judges are exempt from disclosure requirements.⁸

4. CASE LAWS RELATING TO JUDICIAL ACCOUNTABILITY:

Case laws like "*Indira Gandhi vs. Raj Narain*"⁹ and "*Vishaka vs. State of Rajasthan*"¹⁰ speak volumes about the role of the judiciary in social issues and its burden to act upon the principles of justice. However, cases that question the conduct of judiciary, like '*Judges' Appointment Case*', point out the necessity of accountability mechanisms.

4.1. OTHER LANDMARK JUDGEMENTS:

The supreme court in *S.P Gupta v. Union of India*¹¹ (also known as 1st judges transfer case) The central government's attempt to broaden the protection against the public being exposed to sensitive documents was denied by the court, which made it plain that publication of documents is limited to those that are against the public interest. The court stated unequivocally that publication of records is limited to those that are against the public interest in general rather than to any other materials.

In the case of *K. Veeraswami v. Union of India & Ors.* The issue of judicial accountability was made worse by the Indian Supreme Court. The Supreme Court ruled that no judge of the Supreme Court or a High Court may conduct an investigation into a civil or criminal offense without first obtaining cognizance and then obtaining written consent from the Chief Justice of India.

⁸ Garg, Ashutosh, 2021, pg.no,83 <https://doi.org/10.69974/glsawjournal.v3i2.51>

⁹ (1975) 2 SCC 159

¹⁰ AIR 1997 SC 3011,

¹¹ 30 December, 1981

In the case of *Sarojini Ramaswami v. Union of India & Ors.* (also known as *Ramaswamy case*), The lack of a majority vote in the both house of parliament caused the apex court's impeachment to fall miserably.

Key case laws that consist of judgments of the Supreme Court in the 'Second Judges Case' and the 'Third Judges Case' have actually played an instrumental part in building the framework for judicial accountability.

5. CURRENT MECHANISM OF JUDICIAL ACCOUNTABILITY:

More precise provisions pertaining to the upholding of judicial accountability are included in the 1950 Indian Constitution. Both houses of parliament are empowered to start the removal procedure under these constitutional provisions. Backed by most of the house's members present on the ground of proven incompetency or misconduct, followed by a presidential directive This is the Government of India Act of 1935's equivalent clause. It permitted His Majesty to dismiss judges due to misconduct or physical or mental impairment. Constituent authority has authorized the parliament to do more than just start the removal process. but also, for the passage of legislation governing the process for the president of India to deliver an address and for the examination of cases involving misconduct and incapacity. In order to clarify and rationalize the nation's judicial responsibility, the Indian Parliament passed the Judges Enquiry Act, 1968. The act illustrates the viability of the accountability mechanism and vocalizes procedurals fairness for judges who are subject to the impeachment process. According to the Act's framework, an impeachment resolution must have the backing of 100 members of the Lok Sabha and 50 members of the Rajya Sabha. It is important

to remember that only parliamentarians are granted authority under the constitutional framework because of the democratic emphasis placed on this institution. The purpose of this power is to operationalize the concept of checks and balances. In order to encourage the arbitrary removal of judges from office, the Act has stated that the removal procedure should be difficult. The following terms are symbolized by this accountability plan concept. "The removal of a judge is laborious and challenging for a good reason. Judges must to be protected from being removed at the whim of the public or anybody else merely for disagreeing with their philosophies or a specific decision made in a given case (Haines, 2010, p.923). The Act states that after the motion is approved, the speaker or chairman, as the situation may be, should form an investigating committee to look into the accusations made by lawmakers against judges. According to the Judges Enquiry Act of 1968, the results of the investigation's committee, which was established by the parliament, must be presented to both houses of parliament after being communicated to the speaker or chairman, as the case may be. ¹²

¹² https://forumias.com/blog/judicial-accountability-in-india/#What_are_the_challenges_in_enhancing_Judicial_Accountability
last visited on 15 November 2024

6. CHALLENGES IN ENHANCING JUDICIAL ACCOUNTABILITY:

Because the judiciary is an autonomous body and judges' independence cannot be eliminated, regulating judicial accountability presents the biggest obstacle. It will be vulnerable to outside pressure if the Judiciary is held to any kind of accountability to the Executive or Legislature. Finding a balance between judicial accountability and independence is extremely challenging.

Impeachment is the only method available to remove a judge, and it is a drawn-out and difficult procedure. It is challenging to increase judicial accountability as a result. Once more, diluting the procedure would violate judicial independence.

Furthermore, anything that is imposed on the courts without their approval is prohibited by the SC and HC's contempt power. The judiciary can simply overturn anything it wants because it is the ultimate interpreter of laws, regulations, norms, etc.¹³

7. FLAWS IN CURRENT SYSTEM OF JUDICIAL ACCOUNTABILITY:

Despite the framework which has been established, several areas of flaws have ensured that judicial accountability in India cannot be an eventuality:

- 1. Lack of Enforceable Standards:** The fact that clear, enforceable standards relating to judicial conduct are lacking has caused confusion and inconsistency surrounding accountability.
- 2. Inadequate public engagements:** Indian judiciary has not really adopted the project of public engagement, and therefore citizens find it difficult to hold the judiciary accountable.
- 3. Access to information in judicial processes:** Despite the RTI Act, access to information in judicial processes is usually tightly sealed. A lack of openness has derailed the effects of transparency.
- 4. Protection from Parliamentary Accountability:** Article 121, that protects the independence of the judiciary, also prevents parliamentary scrutiny that would compel the judiciary to answer judicial malpractice.
- 5. Resistance to judicial reform:** Judicial authorities find it difficult to accept judicial reforms meant to entrench transparency and accountability.
- 6. Judicial appointments through Sealed Envelope:** This again forms an arena of non-transparency because the very basis and discussion underlying it is never brought out in the open.

¹³ <https://forumias.com/blog/judicial-accountability-in-india/> last visited on 15 November 2024

7. Roaster System: Roaster system where the cases are assigned is again said to create an issue with bias since a particular judge or bench keeps on getting the same kind of cases all the time, raising suspicion in the minds of the public.¹⁴

8. THE ROAD AHEAD:

Following steps to be taken to enhance judicial accountability in India, several reforms are essential:

1. Revive the judicial standard & accountability bill: The Judicial Standards and Accountability Bill in India was introduced in 2010 but ultimately fell through. Setting judicial criteria requires a new bill. According to a former Law Commission chairperson, the new bill should avoid giving the Legislature or the Executive undue power and should solve the issues with the previous one.

2. Enhance public access to information: The scope and extent of RTI's application to the judiciary should be made clear by the SC. By doing this, state-by-state variations in RTI responses will be prevented.

3. Judicial performance appraisals: There should be a system in place for judges to regularly evaluate their performance. At the lower judicial level, there is an evaluation procedure. The upper judiciary does not have a performance evaluation. Developing such a system is challenging. As a first step, best practices from worldwide experience can be appropriately modified.

4. Permanent disciplinary committee: To handle complaints against judges, a central disciplinary commission should be established on a permanent basis. Depending on how serious the wrongdoing is, this committee should suggest additional steps (e.g., establishing a judicial inquiry committee under the Judges Inquiry Act for major misconduct).

5. Publish an annual report: A law requiring the Judiciary to produce an annual report may be passed by Parliament. This law should specify exactly what should be included in the report and when it should be published.

6. Brought under the scope of Lokpal: As seen in nations like Sweden, where the judiciary falls within the purview of the ombudsman, the judiciary can likewise be placed under the Lokpal's purview in order to improve accountability.

7. Training & development of judges: There must be regular training programs on ethics and accountability devised for training judges about responsibility towards accountability and respect for the rule of law.

8. Encourage Public Interest Initiatives: The judiciary must actively promote Public Interest Litigation initiatives that cater to the concerns of the marginalized sections of society and make judicial process more accessible.¹⁵

¹⁴ Garg, Ashutosh, 2021, <https://doi.org/10.69974/glslawjournal.v3i2.51>

¹⁵ Garg, Ashutosh, 2021, <https://doi.org/10.69974/glslawjournal.v3i2.51>

9. CONCLUSION AND SUGGESTIONS:

In conclusion, judicial accountability and transparency are critical for the health of democracy in India. While the existing framework provides a foundation, it is fraught with flaws that must be addressed to restore public faith in the judicial system. By implementing the recommended reforms, India can move towards a more accountable and transparent judiciary that not only upholds the rule of law but also enhances public trust.

BIBLIOGRAPHY:

- Bhatia, Gautam. "Judicial Accountability in India: A Practical Reality?" *Journal of Constitutional Law*.
- Prasad, A. R. N. "Constitutional Provisions: Manners of Judicial Accountability in India." *Indian Journal of Law and Justice*. K. Veeramani v. Union of India, (2019) 2 SCC 580. K. P. Verma v. Union of India, (2018) 7 SCC 778.
- Right to Information Act, 2005, No. 22 of 2005. Judicial Standards and Accountability Bill, 2010.
- Arora, R. (2018). *Judicial Accountability in India: A Critical Perspective*. Journal of the Indian Law Institute.
- Bhatia, G. (2019). *The Collegium System: An Overview and the Way Forward*. Supreme Court Journal.
- Rajagopal, S. (2020). *Revisiting Judicial Appointment Mechanisms in India: A Need for Change*. The Indian Juridical Review.
- Varma, A. (2021). *Transparency and Openness: Keys to Judicial Accountability in India*. Journal of Law and Society.
- Jain, A. (2022). *Judges and Accountability: Boosting Public Confidence in the Judiciary*. Indian Journal of Legal Studies.
- Baxi, U. (2011). *The Rights of the Accused and the Indian Judiciary*. Oxford University Press.
- Nariman, R. F. (2015). *From the Chambers of the Supreme Court*. Lexis Nexis.
- Jha, R. (2020). *Judicial Transparency and Accountability in India: A Need for Change*. Indian National Law Review.
- Khosla, M. (2013). *The Indian Judiciary: A Feminist Perspective*. Gender and the Law in India.
- Mishra, S. (2017). *Impeachment of Judges: A Critical Analysis*. Journal of Indian Law and Society.

www.lateslaws.com last visited on 15 November, 2024

iblogpleaders.com last visited on 15 November, 24

Garg, Ashutosh. (2021) <https://doi.org/10.69974/gslawjournal.v3i2.51>.

