

Judicial Independence and Public Perception under Article 21 of the Indian Constitution

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Abstract - This study investigates the nuanced perspectives of legal professionals and the wider public regarding the Indian judiciary's role in safeguarding rights under Article 21 of the Indian Constitution. A comprehensive survey was conducted with 384 participants, stratified by age, gender, occupation, education, and years of experience. The age distribution revealed that 25.8% were 20-30 years old, with a notable concentration in younger demographics. Gender analysis indicated a male majority at 56.3%. Occupation data showed that 26.8% were academics/professors, followed by legal researchers (25.8%) and law students (21.4%). Regarding educational qualifications, 31.3% held a Master's degree, while 25.8% had a Ph.D. Participants with 8-10 years of experience constituted 23.4%, the largest group. Key findings indicate gender-based differences in judicial effectiveness perceptions, with males showing polarized views (strong agreement at 59 for males vs. 34 for females). Age-based analysis revealed that younger respondents (20-30 years) are more inclined towards positive views on judicial independence. In terms of transparency, younger participants (under 30) exhibited strong opinions, either positive or negative, compared to the balanced views of older respondents (over 50 years). Responses on media influence indicated that males (42% disagree, 36% strongly disagree) were more skeptical compared to females. Legal professionals displayed varied opinions on judicial impartiality and the influence of political ideologies, with law students and legal researchers showing more positive perspectives. This study underscores the significance of demographic factors in shaping perceptions of judicial effectiveness and independence, highlighting the need for continuous evaluation of these influences to uphold judicial integrity.

Keywords: Judicial Independence, Article 21, Public Perception, Transparency in Judiciary.

Introduction - The independence of the judiciary in India, especially in the context of Article 21 of the Constitution, represents a crucial element in the country's legal and democratic framework. Article 21, guaranteeing the right to life and personal liberty, stands at the core of the fundamental rights protected by the Indian Constitution. The critical analysis of the judiciary's independence, with a special focus on Article 21, involves examining how the judiciary has interpreted and applied this right in various landmark cases and the extent to which it has maintained its independence. The seminal work by M. Aparna (2006) discusses landmark cases where the Supreme Court evolved as a savior of mankind, employing Article 21 to protect lives through its judicial activism.

The independence of the judiciary was put to the test during the Emergency period in India (1975-1977), most notably in the ADM Jabalpur v. Shivakant Shukla case. This case is critically analysed by Pranav Verma (2014), who revisits Justice H.R. Khanna's dissenting opinion as a cornerstone for the judiciary's independence and its role in protecting Article 21 rights even during times of political turmoil. Vaidya and Raghuvanshi (2010) delve into the

constitutional mechanisms and historical context that safeguard judicial independence in India. Their analysis underscores the judiciary's critical role in enforcing Article 21 rights and maintaining a balance of power, emphasizing the importance of judicial independence as a non-negotiable pillar of democracy. Despite its strong constitutional foundations, the independence of the Indian judiciary faces numerous challenges, including political pressure, the appointment process of judges, and the temptation of judicial overreach. Abeyratne (2014) presents a critical view of how the Supreme Court's broad interpretation of Article 21 to include socioeconomic rights, while aiming to protect the marginalized, also raises questions about judicial independence and the practical enforceability of these rights.

Pranav Verma (2014) provides a literary and legal analysis of Justice H.R. Khanna's dissent, emphasizing the significance of judicial opinions in preserving fundamental rights and judicial independence.

Vaidya and Raghuvanshi (2010) discuss the constitutional and legal foundations that ensure the judiciary's independence in India. Their analysis

underscores the importance of an independent judiciary in a democratic society, highlighting its role in maintaining the balance of power and protecting human rights. Sameer Boray (2011) examines the judiciary's response to the rights of individuals living with HIV/AIDS, showcasing the protection offered under Article 21. The progress and the challenges in extending rights protections to marginalized groups, reflecting on the judiciary's role as a protector of the disadvantaged (Boray, 2011). The Indian Supreme Court's interpretation of socioeconomic rights within the framework of Article 21. The implications of judicial activism in making Directive Principles justiciable and the challenges it poses to the legitimacy of the Constitution, calling for clear and transparent judicial reasoning to maintain public trust and constitutional legitimacy.

The introduction of PIL has been a significant development in the Indian judicial system, allowing the court to address the rights of the disadvantaged and marginalized sections of society directly. However, it also raises questions about the balance between judicial activism and overreach. The judiciary's role in using PIL to enforce environmental laws and human rights showcases its commitment to using its independence for the broader public interest. The doctrine of the basic structure, established in the Kesavananda Bharati case, has been pivotal in preserving the core values of the Constitution, including judicial independence.

The primary objective of this study is to assess the effectiveness of the judiciary in upholding Article 21 rights in India and its independence in decision-making processes. This involves a thorough examination of how well the judiciary performs its role in safeguarding the fundamental rights guaranteed by Article 21 of the Indian Constitution, while remaining free from external influences and pressures. A secondary objective is to evaluate the perception of both legal professionals and citizens regarding the independence of the Indian judiciary in the context of protecting fundamental rights under Article 21. This objective aims to capture and analyze the views of those within the legal field as well as the general public, providing a comprehensive understanding of the judiciary's perceived autonomy and reliability in upholding constitutional rights.

Background of study

The effectiveness of the judiciary in upholding Article 21 rights in India and its independence in decision-making has continued to be a critical area of focus in recent years. Challenges such as delayed justice and the erosion of public confidence in the judiciary necessitate judicial accountability for a transparent democracy (Kumar & Tiwari, 2019). An examination of Indian judicial activism in environmental protection discusses the judiciary's role in extending the scope of judicial review to protect the environment. Through public interest litigation (PIL), the judiciary has enabled individuals to approach courts for environmental justice, showcasing a balance between progress and environmental

sustainability. This activism reflects the judiciary's commitment to expanding the interpretation of Article 21 to include the right to a clean environment (Prashad, 2018). The alternative forums like Lok Adalats and incorporation of judicial governance to improve the administration of courts and ensure timely justice. Such measures are essential for upholding the principle of justice delayed is justice denied and ensuring the effectiveness of Article 21 rights (Singh & Thakur, 2019).

The Supreme Court's judgements that have expanded its mandate due to the shortcomings of India's representative institutions, emphasizing the judiciary's role in balancing governmental powers and safeguarding constitutionalism (Shriparkash, 2023). The National Education Policy (NEP) 2020 to the constitutional mandate of education, drawing connections between ancient Indian educational traditions and modern policies. It critically analyzes NEP 2020 within the framework of Article 21A, discussing its potential to transform India's educational landscape in line with the goal of an Atmanirbhar Bharat or self-reliant India (Dhage et al., 2023). The Supreme Court has interpreted the right to know as an inherent part of Article 19(1)(a), indirectly linked to Article 21. It traces the ideational movement within the judiciary regarding openness and transparency, showing how judicial verdicts have evolved to address the flow of information in a democracy and its impact on openness in government affairs (Jha, 2021). The judicial system's use of scientific methods like polygraph and narcoanalysis tests to expedite the investigative process while respecting the fundamental rights under Article 21. It discusses the legal framework and judicial perspectives on the admissibility and ethical considerations of these forensic tests in context of ensuring justice and safeguarding personal liberty (Malini & Chandrakanth B, 2020).

The Supreme Court of India's innovative exercise of judicial power is highlighted as a successful mechanism for protecting and promoting human rights, showcasing the judiciary's proactive stance in ensuring justice for the weak and vulnerable (Aithal, 2023). An overview of the right to privacy as a fundamental human right, emphasizing the judiciary's role under judicial review and activism in protecting this right against state surveillance. It reflects on landmark judgments that have fortified the right to privacy under Article 21, shows the judiciary's critical role in defining and defending privacy rights in India (Khan, 2022). An examination of the Indian judiciary's environmental activism showcases how the courts have used Article 21 to protect the environment, demonstrating a significant shift towards recognizing environmental rights as fundamental. This activism is facilitated by the relaxation of locus standi rules and the recognition of the right to a clean environment as part of the right to life (Singh, 2014).

The right to die, as a corollary of the right to life, has been debated in terms of voluntary euthanasia, reflecting

on the balance between life's sanctity and personal liberty to choose death under certain conditions (Rahman & Saikia, 2022). As medical data becomes increasingly digitized, ensuring confidentiality, privacy, and data security becomes paramount. (Singh & Dhiman, 2021). The Supreme Court's decisions in this area demonstrate an approach that combines both direct and indirect application of Article 24, striving towards a more inclusive interpretation of the right against exploitation (Pande, 2020). Courts have used a harmonious construction approach to distinguish between protected speech that furthers public interest and unprotected purely commercial speech. This interpretation ensures that commercial speech regulations can be construed in favor of protecting public health, demonstrating the judiciary's adaptability in balancing rights for societal wellbeing (Subramanian, Gokani, & Aneja, 2022).

With the increasing digitalization of society, concerns around privacy, especially in cyberspace, have gained prominence. Studies examining the constitutional protections for privacy under Article 21 indicate an evolving judicial understanding of privacy rights in the context of modern technologies and the challenges posed by state surveillance and data security (Raghav & Marwaha, 2023).

An evaluative study in the Murshidabad district of West Bengal assessed the implementation of the Right to Education Act, 2009, highlighting the gaps between policy objectives and on ground realities. The importance of addressing these challenges to fulfil the constitutional mandate of providing free and compulsory education to all children (Ali, 2021). The constitutional provisions related to school education in India highlights the integration of Article 21A, emphasizing the state's obligation to provide free and compulsory education to all children in the age group of six to fourteen years. This represents a significant step in recognizing education as a fundamental right and underscores the judiciary's role in safeguarding children's rights to education (P., 2023)

Methodology: This section interprets the significant Pearson Correlation coefficients and analyzes the reliability of the survey data concerning the Indian judiciary's role in upholding Article 21 rights.

Pearson Correlation Analysis:: The survey data was analyzed using Pearson Correlation to explore the relationships between respondents' demographics and their perceptions of the judiciary's effectiveness. Significant results include:

Balancing Individual Rights and Societal Needs (Education: $r = .113$, $p = .026$): A weak but statistically significant positive correlation suggests that individuals with higher education levels may slightly perceive the judiciary as more effective in balancing individual rights with societal needs.

Confidence in Judiciary's Independence (Education: $r = .119$, $p = .020$): A weak positive correlation indicates that higher educational attainment is associated with slightly

greater confidence in the judiciary's ability to protect Article 21 rights, independent of government influence.

Need for Transparency (Education: $r = .101$, $p = .048$): This weak positive correlation suggests that more educated individuals perceive a slightly greater need for transparency in the judiciary's handling of Article 21 cases.

Impact of Political Factors on Judicial Independence (Gender: $r = .131$, $p = .010$): A weak but significant correlation with gender suggests a slight difference in perceptions of political influence on judicial independence based on gender.

Judicial Independence in Safeguarding Article 21 (Education: $r = .118$, $p = .021$): Higher education levels are slightly associated with more favorable perceptions of the judiciary's independence in safeguarding Article 21 rights.

Impartiality Amid Social and Political Conflicts (Education: $r = .106$, $p = .037$): Individuals with higher education may slightly perceive the judiciary as more impartial in Article 21 cases amid social and political conflicts.

Judiciary's Communication Effectiveness (Age: $r = .038$, $p = .039$): A very weak but statistically significant positive correlation suggests that older individuals may perceive the judiciary as more effective in communicating its decisions and reasoning to the public.

Media Influence on Judicial Decisions (Age: $r = .039$, $p = .035$): Similarly, a weak positive correlation indicates that older respondents might perceive a greater influence of media on judicial decisions related to Article 21.

Reliability Analysis (Cronbach's Alpha): The survey's internal consistency was assessed using Cronbach's Alpha:

- **Judicial Effectiveness and Independence:** Two sets, both showing acceptable reliability ($\alpha = 0.721$ and $\alpha = 0.669$).
- **Impact of Jurisprudential Developments:** Acceptable reliability with $\alpha = 0.712$.
- **External Influences on Judiciary:** Also acceptable, with $\alpha = 0.690$.
- **Overall Reliability:** The entire survey demonstrated good reliability with $\alpha = 0.772$, indicating that the survey items collectively measure the intended concepts consistently.

Model Summary: The regression analysis revealed a moderate positive relationship between the independent variables (e.g., public opinion, judicial development) and the dependent variable (Article 21), with an R value of 0.369. The model explains 14.2% of the variance in Article 21, indicating the combined influence of these predictors is statistically significant ($F = 6.175$, $p < 0.001$). Key predictors like judgment, judicial development, and transparency significantly impact perceptions of the judiciary's role in upholding Article 21. This methodology provides a comprehensive understanding of the correlations and reliability within the survey, highlighting the factors influencing perceptions of the judiciary's effectiveness and

independence in upholding Article 21 rights.

Result and Discussion

Survey on the Indian Judiciary's Role in Safeguarding Rights Under Article 21:

This survey seeks to delve into the nuanced perspectives of legal professionals and the wider public regarding the Indian judiciary's role in safeguarding the rights guaranteed by Article 21 of the Indian Constitution. It aims to explore the judiciary's effectiveness, independence, and resilience against external pressures and influences, ranging from political dynamics to public opinion.

Age Distribution of Participants: The data presents the distribution of participants across different age groups (see Table 1 and Figure 1). The data shows a diverse age distribution, with the 20-30 years group being the largest at 25.8%, followed by 31-40 years at 20.3%. The total sample size of 384 participants highlights a significant representation of younger demographics.

Table 1: Age Distribution of Participants

| Parameter | Freq- uency | Percent | Valid Percent | Cumulative Percent |
|---------------|----------------|---------|------------------|-----------------------|
| Under 20 Year | 67 | 17.4 | 17.4 | 17.4 |
| 20-30 Year | 99 | 25.8 | 25.8 | 43.2 |
| 31-40 Year | 78 | 20.3 | 20.3 | 63.5 |
| 31-40 Year | 78 | 20.3 | 20.3 | 83.9 |
| Over 50 Year | 62 | 16.1 | 16.1 | 100.0 |
| Total | 384 | 100.0 | 100.0 | |

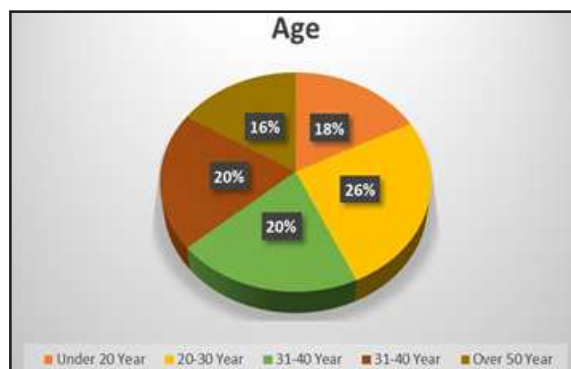


Figure 1: Age Distribution of Participants Gender Distribution of Participants

The data reveals a somewhat balanced gender distribution, with males comprising 56.3% and females 43.8% of the 384 participants, indicating a slightly male-dominant sample (see Table 2 and Figure 2).

Table 2: Gender Distribution of Participants

| Parameter | Freq- uency | Percent | Valid Percent | Cumulative Percent |
|-----------|----------------|---------|------------------|-----------------------|
| Male | 216 | 56.3 | 56.3 | 56.3 |
| Female | 168 | 43.8 | 43.8 | 100.0 |
| Total | 384 | 100.0 | 100.0 | |

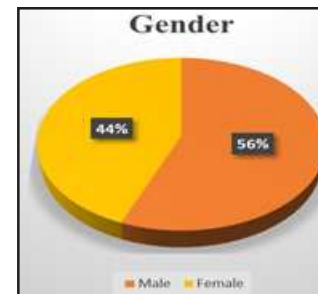


Figure 2: Gender Distribution of Participants Occupation Distribution of Participants

The data shows a diverse professional representation, with academics and professors in law comprising 26.8%, legal researchers 25.8%, and law students 21.4% of the 384 participants, while practicing lawyers and other roles each account for 13.0%. This highlights a strong presence of academics, researchers, and students (see Table 3 and Figure 3).

Table 3: Occupation Distribution of Participants

| Parameter | Freq- uency | Percent | Valid Percent | Cumulative Percent |
|--------------------------------|----------------|---------|------------------|-----------------------|
| Law Student | 82 | 21.4 | 21.4 | 21.4 |
| Academic/Prof- essor in Law | 103 | 26.8 | 26.8 | 48.2 |
| Legal Researcher | 99 | 25.8 | 25.8 | 74.0 |
| Practicing Lawyer | 50 | 13.0 | 13.0 | 87.0 |
| Other | 50 | 13.0 | 13.0 | 100.0 |
| Total | 384 | 100.0 | 100.0 | |



Figure 3: Occupation Distribution of Participants Education Distribution of Participants

The data outlines the educational qualifications of participants (see Table 4 and Figure 4). A highly educated cohort, with 31.3% holding a Master's degree, 29.7% a Bachelor's degree, and 25.8% a Ph.D., among 384 participants. High school graduates make up 8.6%, and other qualifications represent 4.7%, indicating a strong presence of advanced degrees in the sample.

Table 4: Education Distribution of Participants

| Parameter | Freq- uency | Percent | Valid Percent | Cumulative Percent |
|--------------------------|----------------|---------|------------------|-----------------------|
| High School | 33 | 8.6 | 8.6 | 8.6 |
| Bachelor's Degree | 114 | 29.7 | 29.7 | 38.3 |
| Master's Degree Ph.D. | 120 | 31.3 | 31.3 | 69.5 |
| Or equivalent | 99 | 25.8 | 25.8 | 95.3 |
| Other | 18 | 4.7 | 4.7 | 100.0 |
| Total | 384 | 100.0 | 100.0 | |

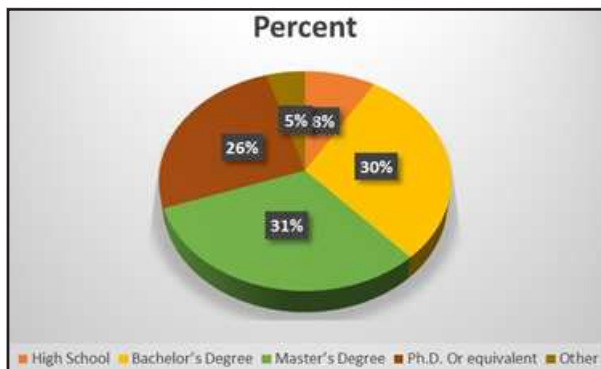


Figure 4: Education Distribution of Participants

Years of Experience Distribution of Participants: The data displays the distribution of participants based on their years of experience (see Table 5 and Figure 5). Data indicates a diverse range of experience levels among 384 participants, with the largest group having 8-10 years of experience (23.4%), followed by 1-3 years (22.1%). Both the 4-7 years and more than 10 years groups represent 18.5% each, while 17.4% have less than 1 year.

Table 5: Years of Experience Distribution of Participants

| Parameter | Freq- uency | Percent | Valid Percent | Cumulative Percent |
|----------------------|----------------|---------|------------------|-----------------------|
| Less than 1 Year | 67 | 17.4 | 17.4 | 17.4 |
| 1-3 Year | 85 | 22.1 | 22.1 | 39.6 |
| 4-7 Years | 71 | 18.5 | 18.5 | 58.1 |
| 8-10 Year | 90 | 23.4 | 23.4 | 81.5 |
| More than 10 Year | 71 | 18.5 | 18.5 | 100.0 |
| Total | 384 | 100.0 | 100.0 | |



Figure 5: Years of Experience Distribution of

Participants Effectiveness of the Judiciary in Upholding Article 21 Rights

The survey results indicate notable gender differences in responses (see Table 6 and Figure 6). Males showing a stronger polarization in opinions 59 strongly agree and 41 disagree compared to females, who had 34 strongly agree and 26 disagree. Neutral responses were slightly higher among males (39) than females (28). Females exhibited a more balanced distribution across agree (45) and neutral (28), suggesting that males tend to hold stronger opinions, while females maintain a more moderate stance.

Table 6: Effectiveness of the Judiciary in Upholding Article 21 Rights

| Parameter | Strongly Dis- agree | Dis- agree | Neutral | Agree | Strongly Agree | Total |
|-----------|---------------------------|---------------|---------|-------|-------------------|-------|
| Male | 33 | 41 | 39 | 44 | 59 | 216 |
| Female | 35 | 26 | 28 | 45 | 34 | 168 |
| Total | 68 | 67 | 67 | 89 | 93 | 384 |

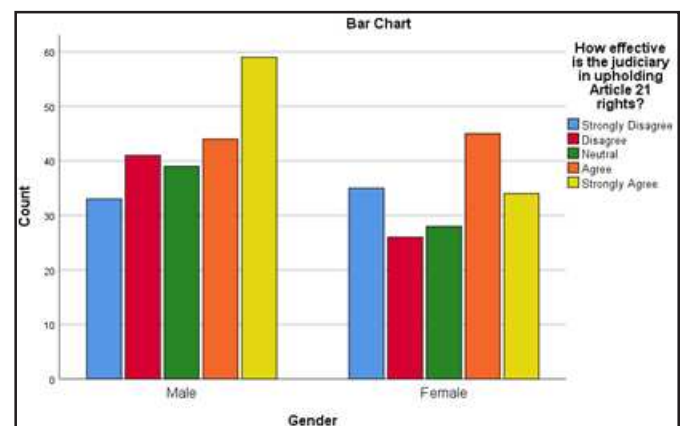


Figure 6: Effectiveness of the Judiciary in Upholding Article 21 Rights Influence of Political Factors on Judicial Independence

The data reveals notable differences in responses across various age groups (see Table 7 and Figure 7). Younger respondents (under 30) tend to hold more positive views, while older respondents (over 50) maintain a balanced perspective, with the 20-30 age group showing the highest agreement.

Table 7: Influence of Political Factors on Judicial Independence

| Parameter | Strongly Dis- agree | Dis- agree | Neutral | Agree | Strongly Agree | Total |
|------------------|---------------------------|---------------|---------|-------|-------------------|-------|
| Under 20 Year | 7 | 12 | 15 | 19 | 14 | 67 |
| 20-30 Year | 14 | 18 | 15 | 27 | 25 | 99 |
| 31-40 Year | 10 | 15 | 13 | 18 | 22 | 78 |
| 31-40 Year | 11 | 18 | 12 | 21 | 16 | 78 |
| Over 50 Year | 11 | 12 | 9 | 16 | 14 | 62 |
| Total | 53 | 75 | 64 | 101 | 91 | 384 |

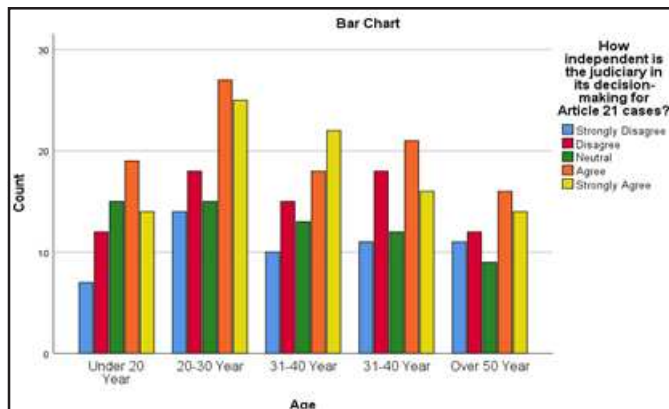


Figure 7: Influence of Political Factors on Judicial Independence

Impact of External Influences on Judicial Decision-Making Related to Article 21

The survey results reveal distinct patterns in male and female responses (see Table 8 and Figure 8). Males are more likely to strongly agree, while females exhibit a more balanced range of responses, with males generally holding stronger positive opinions.

Table 8: Impact of External Influences on Judicial Decision-Making Related to Article 21

| Parameter | Strongly Dis-agree | Dis-agree | Neutral | Agree | Strongly Agree | Total |
|-----------|--------------------|-----------|---------|-------|----------------|-------|
| Male | 35 | 32 | 40 | 56 | 53 | 216 |
| Female | 26 | 29 | 33 | 37 | 43 | 168 |
| Total | 61 | 61 | 73 | 93 | 96 | 384 |

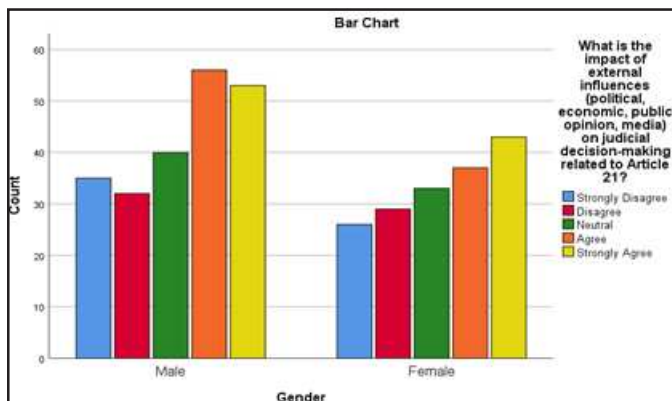


Figure 8: Impact of External Influences on Judicial Decision-Making Related to Article 21

Extent of Political Factors Affecting Judicial Independence

The data reveals distinct differences in responses across various age groups (see Table 9 and Figure 9). Younger respondents (20-30 years) show a predominantly positive outlook, while older respondents (over 50 years) maintain a balanced and moderate perspective, with neutral and agreement being common.

Table 9: Extent of Political Factors Affecting Judicial Independence

| Parameter | Strongly Dis-agree | Dis-agree | Neutral | Agree | Strongly Agree | Total |
|---------------|--------------------|-----------|---------|-------|----------------|-------|
| Under 20 Year | 12 | 13 | 17 | 14 | 11 | 67 |
| 20-30 Year | 16 | 15 | 15 | 27 | 26 | 99 |
| 31-40 Year | 13 | 12 | 18 | 25 | 10 | 78 |
| 31-40 Year | 12 | 16 | 19 | 17 | 14 | 78 |
| Over50Year | 10 | 9 | 17 | 13 | 13 | 62 |
| Total | 63 | 65 | 86 | 96 | 74 | 384 |

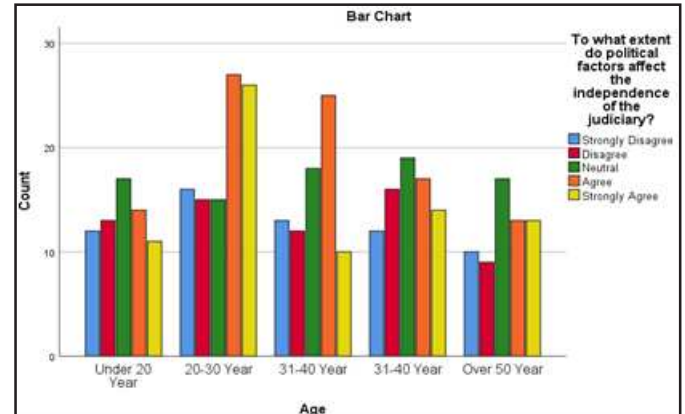


Figure 9: Extent of Political Factors Affecting Judicial Independence

Influence of Public Opinion on Judicial Decisions on Article 21 Cases

The data reveals distinct differences in responses across various professional groups within the legal field (see Table 10 and Figure 10). Law students and academics lean towards positive views, legal researchers show diverse opinions, practicing lawyers maintain a moderate stance, and other respondents exhibit balanced perspectives.

Table 10: Influence of Public Opinion on Judicial Decisions on Article 21 Cases

| Parameter | Strongly Dis-agree | Dis-agree | Neutral | Agree | Strongly Agree | Total |
|----------------------------|--------------------|-----------|---------|-------|----------------|-------|
| Law Student | 13 | 19 | 17 | 23 | 10 | 82 |
| Academic/ Professor in Law | 10 | 20 | 26 | 27 | 20 | 103 |
| Legal Researcher | 15 | 22 | 21 | 22 | 19 | 99 |
| Practicing Lawyer | 7 | 13 | 8 | 11 | 11 | 50 |
| Other | 8 | 7 | 9 | 13 | 13 | 50 |
| Total | 53 | 81 | 81 | 96 | 73 | 384 |

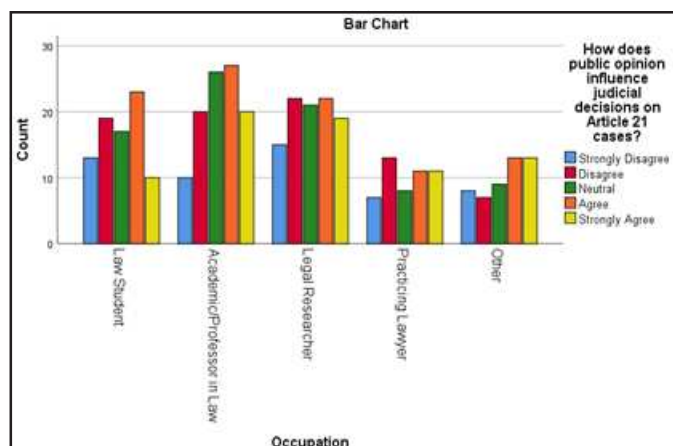


Figure 10: Influence of Public Opinion on Judicial Decisions on Article 21 Cases

Conclusion: The survey provides a detailed analysis of the perceptions held by legal professionals and the general public regarding the Indian judiciary's role in upholding Article 21 of the Indian Constitution. Drawing from a sample of 384 participants, the demographic variations in views on judicial effectiveness, independence, transparency, and susceptibility to external influences. The age distribution highlights a predominantly young demographic, with the 20-30 years age group constituting 25.8% of respondents, while individuals under 20 years and over 50 years comprise 17.4% and 16.1%, respectively. Gender analysis shows a slightly male-dominated sample, with males constituting 56.3% and females 43.8%. Academics and professors in law represent the largest occupational group (26.8%), followed by legal researchers (25.8%) and law students (21.4%). Regarding educational qualifications, 31.3% hold a Master's degree, 25.8% possess a Ph.D., and 29.7% have a Bachelor's degree.

Key findings indicate significant gender-based differences, with 59 males strongly agreeing on judicial effectiveness compared to 34 females. Younger respondents (20-30 years) generally have a more positive outlook on judicial independence compared to older groups. Transparency perceptions also vary, with younger participants expressing stronger opinions, while older respondents maintain more balanced perspectives. Media influence is perceived with greater skepticism among males, with 42% disagreeing and 36% strongly disagreeing. Professional opinions diverge, with law students and researchers displaying more positive views on judicial impartiality, contrasting with the more moderate perspectives of practicing lawyers. These results underscore the influence of demographic factors on perceptions of the judiciary, highlighting the necessity for continuous evaluation and reform to bolster judicial integrity and public trust in India.

Future Scope: Expanded Demographic Analysis: Future research can include more diverse demographic groups to better understand varying perspectives.

Longitudinal Studies: Conducting longitudinal studies to track changes in opinions over time. **Comparative Studies:** Comparing the Indian judiciary's effectiveness with other countries.

Impact of Reforms: Evaluating the impact of recent judicial reforms on public perception and trust.

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