COVERAGE OF SEXUAL ASSAULT CASES ON PRIME TIME NEWS

Shreya Mohan, Dr. Aasita Bali

Department of Media Studies, CHRIST (Deemed to be University), Bangalore

ABSTRACT

The rise in sexual crimes in India is something that is known to not just Indian citizens, but also to people all over the world. When given a platform to bring out and expose the accused, the hidden and the unknown, it gives a sense of courage to the victims of sexual attacks. Prime-time news shows do exactly that. The paper revolves around how prime-time news shows cover sexual assault cases and its importance and relevance in Indian context. The method of presentation and reportage of such cases is different on different platforms and ethics is something that is strictly to be abided by in the field of journalism. The paper brings out the analysis of the debates between people who are involved directly or indirectly in the issue and delivers it to the viewers. It acts as a vehicle of information delivery and a platform to express unbiased and honest information to the audience. Most shows on prime-time encourage and display the dominant culture and ideologies existing in the area of reportage. The paper involves a detailed content analysis over a time frame of three months of the show called ‘The Newshour Debate’ & ‘The Clash’, being telecasted on Times Now. The wave of #metoo was recorded as it occurred during the time frame chosen for analysis. Using a method of quantitative analysis, the different themes in the content are noted using a coding sheet. It comprises of a thematic analysis of interviews of professionals from the media industry. The cited paper has also followed a similar content analysis framework on a smaller scale (Grauerholz & King, 1997) . As mentioned by (Cuklanz & Moorti, 2006), the analysis of such cases on television brings out a new genre of televisual feminism.

Keywords: Gender Studies, Prime Time News Shows, Sexual Assault, Televisual Feminism

1. INTRODUCTION

The word Media is derived from the wordMedium, which means the vehicle that carries information. The media informs, educates and entertains people and therefore plays an extremely responsible role in doing so. Social issues like rapes, discrimination, violation of human rights

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and the like are all covered by various mediums and television is one among the most important and relied upon mediums of today (Dwivedi & Pandey, 2013).

Sexual brutality, exploitation and cases of harassment are covered on the news very often but reportage based on certain fundamental journalistic standards and ethics is extremely important. The emphasis has shifted from that of credibility, cause and passion to that of commercializing the news and expanding TRPs. There is an uncalled for sensationalizing of news (exchange4media, 2018). With the traditionalistic yet modern society we live in, individuals will in general take in everything that is seen on television news, without much thinking.

Media exposure is important to inform and provoke public awareness, debate, and policy responses. Journalists, though, are highly selective in what they report and can be guilty of voyeurism and sensationalism. Coverage can decontextualize abuse, encourage racism, promote stereotypes of women (as virgins or whores), blame victims, and excuse assailants (Kitzinger, 2004).

Society places a responsibility on women to shield themselves against sexual violence, leaving survivors with a sense of blame attached to their assault. If these feelings are exacerbated through unethical coverage, it can not only undermine legal sentences, but cause fatal results (Evans, 2018). The Society of Professional Journalists’ Code of Ethics have listed out the various codes to follow while reporting. They have highlighted how ethical journalism includes being accurate and fair and avoiding bias (Society of Professional Journalists, 2014).

Minimizing the harm caused while reporting, is one of the foundations of journalism ethics. Invading personal space, publishing statements of libel and misleading people into the wrong should never be the intentions of any news agency; not just because it is illegal or unethical, but also as it is against the philosophy that even pre-dates Christianity (Bunton, 2017).

2. PRIME TIME NEWS

Prime Time is that slot of time on television that earns the channel the billions of dollars each year. It is the financial jewel in the media crown Of the 28,000 hours the broadcast networks program yearly, about one-fifth, i.e. approximately 170 hours of prime-time programming each week is singled out for special critical attention. The 22 prime-time hours from 8 to 11 PM (EST) six days each week and from 7 to 11 PM on Sundays – constitute the centre ring for all networks, the arena in which their mettle is tested. Prime Time is the most heavily promoted and most talked about part of any schedule. The prime hours make or break a network’s reputation and continues to be the most visible part of an entertainment corporation’s businesses. Prime time is the main outlet for all modes of original production of a channel therefore failing at getting the required TRPs and not being able to generate a hit show for the slot will eventually result in a fall of business and affect the financial circle of the business (Eastman & Ferguson, 2006).
The prime time is precisely the bracket of time late evening wherein the maximum number of viewers would tune in to watch selected shows. It varies from country to country based on the average number of people tuning in at a particular time. Lifestyle and ways of living affects the time that people tune in to watch television.

In India, the prime time is said to be between 20:00 and 22:30 hours. Television channels run the most popular and most viewed shows during the prime time.

The concept of prime time was gifted to Indian audience by Doordarshan. Prime time for a regional news channel may be different than that of a national news channel. Examples could include Newsroom and News Today on India Today, Left, Right and Centre on NDTV and many more.

Various news pieces are influenced by racist myths, nationalistic themes, political angles, conflicting opinions and so on (Gill, 2007).

Every show has their own speciality and distinctive ways of broadcast and reportage. Viewers tune in as per their liking to see what caters to their needs and what answers precisely their questions of thought with regard to the case being covered.

The need for prime time news has been on a constant high & low over time. The concept of prime news is important as this highlights the major issues and the topics of discussion in the current day scenario. It brings a time of discussion among people who are involved directly or indirectly in the issue and brings out details of the specific case and delivers it to the viewers. It not only serves as a platform of information delivery, but also as a platform to express unbiased and honest information to the viewers. The importance has grown over time as issues like judgements on bills being passed, opinions and suggestions with regard to issues from professionals of the industry, cases that are trending are covered through debates and panel discussions on the show. Most shows on prime time encourage and display the dominant culture and ideologies existing in the area of reportage.

Raj Nayak, CEO of Colors TV says,

‘The phrase ‘kill for prime time’ is what we broadcasters are often heard using. As we don’t have the budget to program for all 24 hours of the day, we prepare content for five to six hours and that becomes our prime time. If we can get good traction for a new show during that time, it may also get an equally good viewership ratings for its reruns as well’ (Indian Television Team, 2016).
3. SEXUAL ASSAULT CASES ON PRIME TIME NEWS

The relationship between prime time television and social change is complex (Cuklanz, 2000). Prime Time news has been analysed on several occasions from various lenses, but the gender lens is relatively recent. This paper maintains a sustained focus on coverage of sexual assault cases on prime time news. Different mediums represent the same news in various ways.

On one hand, crimes of sexual violence evoke widespread horror and disgust, yet, on the other hand, there is still a pervasive belief in the idea that women are in some way guilty or responsible if they are raped – they were dressed provocatively, they were out alone at night, they ‘led the man on’ etc. Despite important recent improvements in the criminal justice system’s responses to sexual violence, media reporting of rape remains powerfully framed by some outdated and pernicious discourses that are at best unhelpful and at worst dangerous. There has been a shift from how news was a service to the society before, to now being mostly just a business and gaining the required TRPs. Over the past twenty years, what has been broadcast on television has changed due to factors like that of political, economic, regulatory and technological shifts (Gill, 2007).

In the Indian scenario, 99% of sexual crime cases go unreported (Bhattacharya & Kundu, 2018). Some cases come into notice of the public via mediums like the prime time news, due to various aspects of the case like brutality, political connections, involvement of a popular personality and so on (Pandit, 2018).

‘Sympathy is always given to women these days when such a case happens’, the Senior Editor at Times Now quoted (Narasimhan, 2018). Though sex crimes are controversial and an area where a battle of spats take place, it is now openly presented without hesitation on news shows, especially prime time debates.

Many a times only when the level of violence crosses the mark of ‘normalcy’, is when it is considered newsworthy and therefore becomes sensational news. The violence includes several forms and the veracity varies from case to case. The cases that hit the headlines are the ones that are extraordinary in nature involving brutal forms of violence beyond one’s imagination. (Bathran & Govindaraju, 2016).

One main example of presentation of a case that ran the headlines for weeks together and caused a huge movement all over India and abroad would be the Nirbhaya Rape case that took place in Delhi in December 2012. Right from Day 1, that is 17th December 2012 (the day after the incident), the media covered every detail possible and this led to the creation of a stir among the public. Over 1515 articles appeared only in the US from December 16th to February 16th solely (Lapsia, 2015).
The citizens of India organised widespread protests and candle light marches in support of the victim, then named ‘Nirbhaya’ and demanded justice. When the victim passed away while in Mount Elizabeth Hospital in Singapore for treatment, the media and public mourned her death and demanded to ‘Hang the Rapists’. The kind of outcry that this case brought about was unlike any other. What is unknown is the fact that there was another rape case of a five year old girl who was kidnapped and then raped by 2 men repeatedly. Foreign objects were inserted and she was in critical condition. This case happened around the same time but did not receive the attention it should have. This could be assumed to have been because the Nirbhaya victim had left behind a diary that encapsulated her dreams and ambitions in life which gave more added value to news channels (Lapsia, 2015).

The prime time covered the actions taken and the progress made in the Nirbhaya case through time and conducted various debates to discuss on future actions to be taken to increase the safety and security of women in India. After the death sentence was given to the 5 accused in the case, debates and panel discussions were held on various channels during prime time. The death sentence was a topic of heated debate as it went against the moralistic thoughts of certain people, while a few agreed to the decision made by the court.

The prime time shows not only help deliver important information to the public, but also warn viewers of the dangers out there in the society. They present facts and statistics based on researches about safety of women, rape cases and sexual assaults of women. They bring to light the loopholes in the political system as well as the police and the promises made with regard to safety of women. Due to such loopholes being highlighted, further on many laws have a chance in being amended and other new laws can even be brought about. The Criminal Law (Amendment) Act 2013, was passed 3 months after the Nirbhaya rape case and was in response to the Verma Committee Report. This Act included various amendments under various areas, which is the Indian Penal Code, Code of Criminal Procedure and Indian Evidence Act (Lapsia, 2015).

Involvement of the media in such cases and conveying news, instigating emotions leads to various changes, be it good or bad.

4. THEORETICAL FRAMEWORK – NORMATIVE/SOCIAL RESPONSIBILITY THEORY

Freedom of expression under the social responsibility theory is not an absolute right, as under pure libertarian theory. One’s right to free expression must be balanced against the private rights of others and against vital society interest (Siebert, Peterson, & Schramm, 1956).

The social responsibility theory conveys the importance of media being accountable for their own actions and the opinions they promote. Sexual Assault cases while being covered must be
accurate, objective and must be completely honest without any bias. The Social Responsibility Theory makes sure journalism professionals report with commitment without bias, objectively and transparently (Oluoch, Agalo, & Day, 2017). It is an extension of the libertarian philosophy in that the media recognize their responsibility to resolve conflict through discussion and to promote public opinion, consumer action, private rights, and important social interests (Ravi, 2012).

Television News is a public platform that provides the service of informing the public of the various happenings and keeping them up to date with the same. They can be used to promote healthy opinions and to support the right party and help achieve justice, but the same system when driven by the sole purpose of profits and business deviates from its actual role in the society. Such fabrication of news conflicts with the philosophy of the social responsibility theory.

In order to follow the theory, the media must follow certain codes of conduct and professionalism. There should be regulation in the method of expression of opinion and news. While covering news the platform in context must make sure that they do not promote any form of violence or disruption in the societal system, neither must they hurt the sentiments of any communal or religious groups. India being a secular country promotes the diversity and therefore it must reflect in the way news is presented as well. (Thompson, 2015)

As per Denis McQuail a communication scholar, the social responsibility theory has certain basic principles that must be followed – media must acknowledge the needs of the society and oblige to them, these commitments to the society must be met by setting certain standards with regard to information, truth, accuracy, objectivity and balance, while obliging and fulfilling the needs of the society the media must restrict themselves and adhere to the rules set by institutions of law and order, the media must avoid content that may insult or humiliate, trigger crime, violence and civil disorder to minority groups, media should be in support of multiculturalism and must respect the diversity that exists in the society and appreciate the various points of view of people, media must give a chance to all express their opinions, the society and public have the right to expect high standards of fulfilment of their needs by the media and finally, the media professionals and journalists must answerable to employers, public and viewers (Ravi, Media and Social Responsibility : A critical perspective with special reference to Television, 2012)

5. METHODOLOGY
The methodology here is through the analysis of content of prime time shows on a certain channel and observations made by the researcher through interviews conducted of media professionals.
5.1 Content Analysis

‘Content Analysis’ is in some cases used as a conventional term to refer to a wide variety of methods that is used to analyse texts, but in actual terms it is used to analyse a specific set of data, i.e. it is a quantitative technique which measures certain aspects of media content. It includes tallying and calculating the recurrence/frequency of certain patterns, using a coding framework that has been prepared earlier. (Gill, 2007).

Benefits of opting for this method includes feasibility, easy accessibility to online content, archives and the ability to strengthen arguments through statements recorded by professionals on the debate show. Whereas the limitations include subjective interpretations of statements and difference in accuracy of understanding. Content analysis tends to gloss over the specificities of representations and offers instead a tale of the persistence of certain well-worn stereotypes (Gill, 2007).

The channel chosen for the content analysis segment of this paper is Times Now. Their prime time news show is The Newshour Debate & The Clash. The time frame chosen for analysis is from August 1st 2018 – October 31st 2018.

This particular time frame was chosen for two particular reasons, one was that of the rate of sexual assault cases that took place at the time and the upsurge of the #metoo wave that came into India, and two, was due to the ability to derive a pattern and code framework within the three month period which in turn would help bring a firm structure to the paper.

5.2 Expert Interviews

Thematic Analysis of the expert interviews conducted amounts to a form of qualitative research. In contrast to quantitative research, expert interviews are fluid and flexible. Through the process of conducting the same, various key trends are identified which then require a systematic analysis by the researcher (Braun, Clarke, & Rance, 2014).

The analysis is that of 5 recorded interviews of professionals from journalistic backgrounds. Certain patterns of thought were recorded as the same set of questions were posed to all the interviewees. The codes identified included ‘ethics to be followed in journalism’, ‘#metoo movement’, ‘audience expectations’, ‘sources of information’ and ‘role of prime time news shows’ and the like. An inductive approach was used during analysis as the conclusions derived were data driven and not pre conceived.
6. FINDINGS & DISCUSSION

6.1 Thematic Analysis of Interviews

1. Ethics

All 5 interviewees believed in following of certain codes of conduct and ethics while covering news on sensitive topics like sexual harassment. The main points that were put across were that off respecting the privacy of the victim and not harming his/her identity at any point in time.

There must be maximum output with minimum disclosure in such cases (Ayyapadas, 2018). No matter how much a channel sensationalizes it, disclosure must be avoided wherever possible since it may adversely affect the victim. Jeopardizing the privacy of a woman is against the law, yet sometimes it happens, though these days it is rare in television.

There is no formula to gaining information, rather every story needs to take a different call as per the scenario (Manisha, 2018).

When a formal complaint is lodged, a judgement cannot be based on an accusation or allegation until something is proved with substantial evidence (Narasimhan, 2018).

Many a times, the words used is against the ethics of television news coverage. An example to explain the same includes the usage of words in Tamil News channels that has changed over time and how the word that means ‘rape’ was earlier ‘karpalipu’ meaning destroying her sanctity/virginity, but now they have changed it into words that have a more sober meaning.

The importance of gender sensitivity is one among the most important things that needs to be highlighted while codes of conduct to be followed during reportage (Saratha, 2018).

The Press Council of India and the NBA have laid down rules for the channels to follow while covering such news (Subramaniam, 2018) (Press Council of India, 2010).

2. Sources of Information

The main 2 sources identified via the responses from the interviewees, were that of the police and the victim or family of victim. If the witness is ready to face the camera, their statements are recorded for coverage, else they are spoken to and facts are noted down. In other situations wherein they refuse to talk to the news channel, it is the police who is called for information. Sometimes residents of the area are spoken to for further information (Ayyapadas, 2018).

The First Information Report (FIR) is the primary source and while the case is at the allegation stage, it can be challenged in court. It is considered the starting point for any case of sexual harassment which is decided to be dealt with legally (Manisha, 2018).
In many cases, for example, the organization where the incident took place; they might have an internal committee that will look into the matter. In such cases, they become a source of information as well (Narasimhan, 2018). Sometimes a team of reporters are sent to cover the news, cross check with the police and call both parties involved in the case to confirm information collected. After the mentioned process, they convey judgements based on the information collected by their reporting team.

The Standard Operating Procedure (SOP) is that of speaking to the person making the allegation, the accused, the eye witness, the organization and the police (Subramaniam, 2018). In 2014, the SOP came in place after certain discrepancies were found in Doordarshan’s Urdu and Kashir (Kashmir) channels. A procedure had been formulated for multi – layer examination of any proposal given by the channel in order to avoid any corruption or contortion at any level of the organisation (Indian Television Team, 2014).

3. Audience Expectations

The main audience expectation is to know more on the case, the progress and to gain explicit details of the same.

The audience wants all subjective points of doubt to be answered and therefore that would be the aim of the channel as well (Ayyapadas, 2018).

4. #MeToo Movement

All interviewees were in support of this wave of a movement that came to India which had an upsurge especially during the month of October. They believed it supported women and that it gave them a helping hand in coming out to express their experiences and traumas. The other side of the movement was also expressed. It could be used in order to malign a certain person’s character and identity on various forums.

Accusations have been hurled at times wherein the other person is not given a fair chance to respond to the allegations. Certain US news agencies takes more effort to investigate on such cases. Example includes that of ‘The Guardian’ and ‘New Yorker’ and how their team researched for more than a year in order to gain explicit and credible information on certain cases. It has been more of a journalist or social media led movement in India, than a movement led by credible information (Manisha, 2018).

Another aspect was that of how the movement became only about women (Narasimhan, 2018).

All interviewees believed that character slandering was against ethics and therefore until someone is proved guilty they must not be shown in the wrong light, but yet there was a nod to the fact that it still happens during coverage.
5. Role of primetime news shows

Disclosing crucial information in more explicit detail

To open a forum for discussion to express various opinions on the topic/case

To spread awareness

To discuss after effects of a certain case

Television has a zero tolerance approach and therefore they follow ethics most of the time, but sometimes unnecessary panellists are called for discussion in certain forums. The Asaram rape case is a clear example where a certain panellist was called who defended Asaram when he had already been proved guilty (Manisha, 2018).

Prime Time has also recently begun covering cases mainly on women and their difficulties in the Indian society. The projection of a certain topic or case models the opinion of the viewers eventually (Narasimhan, 2018).

It is agreed that it is ok to be bias when it comes to prime time as sometimes it is a clear cut case where there is full proof against the accused (Saratha, 2018).

6.2 Content Analysis

Channel chosen: Times Now

Show chosen: The Newshour Debate & The Clash

Time Period: 3 months (August, September, October)

Total no. of episodes with content on sexual assault cases – 23
With regard to cases of sexual assault and violence on women, the codes have been identified to elaborate on for the purpose of enhancing the research with credible information and references.

**Blurring of Visuals** – Out of 23 episodes, only 4 episodes had visuals that required to be blurred. They were those of the victim’s mother of the Kathua Rape Case and her interview to the team of Times Now. As per the Cable Television Network Rules, 1994 – Rule 6 (1) (a) states that no programme should be carried in the Cable Service which offends against good taste or decency and Rule 6 (1) (o) provides that no programme should be carried in the Cable Service which is not suitable for unrestricted public exhibition. These rules can be brought into this context while we connect it to the broadcast of CCTV footages of sexual harassment cases or that of brutal visuals (Government of India, 2016).

**Revealing of Accused Faces** – Except in one case (rape case), all other cases showed the accused peoples’ faces. In cases involving #metoo most were popularly known personalities, i.e. Ganesh
Acharya, Nana Patekar, MJ Akbar, Bishop Franco Mulakkal, Alok Nath, Rajat Kapoor, Sajid Khan, Vikas Bahl, Abhijeet Bhattacharya, Anu Malik, Vairamuthu, Chetan Bhagat, Gursimran Khamba and many more and therefore their picture were put out during debates and panel discussions. The Press Council of India, lays down guidelines that state clearly that while reporting about minors (below 16 years) who are victims of sexual assault and harassment, their identity must be protected. The friends and family of the minor also must not be revealed until and unless consent is given, or unless the information is relevant to the story. Example of a failure of following the code would be that of revealing the nationality and colour of the rape victim from TISS in 2010. The revelation was unnecessary and did not any relevance to the story, but only promoted prejudice against white women and portrayed them as immoral individuals (Makhija, 2011).

Inclination of Opinion of Moderator – In 22 out of 23 episodes, the moderator was noticed to favour the victim and partially take their side (expressing bias). They do not go against the parties that are against the victim, but give them a chance to present their stance. In all 23 episodes, the journalist presented their personal opinions very openly and took sides with freedom. In 2016, a poll showed that out of 480 respondents, 71% thought that news coverage is bias (Live Mint, 2016).

Follow up of Case – All 23 episodes started with a recap and follow up with regard to the progress made in the case in discussion.

Sting Operations – 1 out of 23 episodes had a sting operation conducted to reveal the truth behind the Tanushree Dutta vs Nana Patekar case, wherein the director, producer etc of the movie ‘Horn Ok Please’ was secretly interviewed and captured on camera revealing their thoughts and actions behind the case. The press has the freedom of speech and expression under Article 19 (1) along with certain restrictions. The main intention of journalism is in public interest and sting operations serve the same, therefore under the law it is not seen as illegal (Aldak, n.d.).

IPC Sections highlighted – 11 out of 23 episodes had panellists or the moderator itself speaking of Sections of the Indian Penal Code for the viewers to know about the case and the law that supports it. This helps the audience know relevant information not just with regard to the case but also for subjective purposes. Few of those laws mentioned included were that of only a female officer that has the authority to arrest the accused woman, a woman who has been accused can refuse to go to the police station between 6 pm & 6 am, demanding sexual favours despite expressing disinterest in the same is a crime under IPC Section 354 (A), stalking is considered an act of sexual harassment and is a crime under IPC Section 354 (D), a colleague demanding a sexual favour at a workplace can be charged under the Sexual Harassment of
Women at Workplace Act of 2013, any workplace with more than 10 employees must have an internal complaints committee as per the Sexual Harassment of Women at Workplace Act of 2013, making public remarks with sexual intents at a woman is a crime under IPC Section 509, making unwanted physical contact with a woman against her will is punishable under IPC Section 354 (A) and many more (Banerjee, 2015) (Mehrotra, 2014).

Panellists – 20 out of 23 episodes involved at least one panellist that was a lawyer. In most cases more than one lawyer was part of the panel. 1 episode had a businessman, 3 had people from police backgrounds, and 12 had politicians / party representatives, 6 from journalism backgrounds, 9 from the film making / Bollywood industry and 4 who were from literary backgrounds.

Hashtags followed – 21 out of 23 episodes followed a hashtag and also showed popular tweets with the hashtag on their twitter feeds.

Feminist Opinions – 23 out of 23 episodes presented feminist opinions along with other subjective presentations of opinions by panellists as well as the moderator/presenter.

Misogynistic Opinions – 19 out of 23 episodes presented misogynistic opinions.

Majority Women Panellists – only 3 episodes out of 23 had majority of women panellists even though the topic was about sexual crime against women, the rest of the episodes were dominated by male panellists.

7. CONCLUSION

In today’s times, there is an agenda set by the media to achieve their goals. To achieve these goals, their method could involve bias and inculcate the trends of the time. Many a times it is observed that these trends are followed to gain more TRPs and to reach their break even. The influence could be political, economic, celebrity centred and more. (Ravi, Media and Social Responsibility : A critical perspective with special reference to Television, 2012)

Journalistic ethics though laid down clearly via institutions of law, or be it by the Press Councils and various other such organisations, there is still a lack of discipline and passion in the media today. India being such a diverse country, it requires a strict framework that will ensure the media abides by the rules and regulations set for television coverage. The freedom of speech and expression that is granted to the public and media of India must not be mishandled and should rather enable the society to function in an independent manner devoid of bias and discrimination.

There are various sections of the IPC that are unknown to the public and therefore awareness on the same must spread. Cases of sexual assaults and harassments have not decreased in India and therefore it is important for the media to act a vehicle of social change. With the help of shows
that broadcast on prime time, with more educative unbiased information with regard to sexual assaults, people will be well informed. More women panellists must be present for panel discussions and debates, this will not only build the confidence but bring assure the female victims of sexual abuse.

Sexual Harassment though is not an occurrence only among women, but among men too, though still largely among women in India. Movements like #metoo must not be gender bias. It acts as a medium to voice out experiences that may have scarred a person and therefore must be promoted by all. It must apply to all genders, including transgenders who may have been victims of abuse too.

Maligning and defaming a certain person for benefits must be avoided when such waves of movements come about. Strict laws must be put into practice and action must be taken against those that bring shame to endeavours like #metoo.

The truth about the media industry is a puzzle in itself. Media Studies is not just for students who opt for journalism, but education on basic rights to freedom of expression and speech must be taught to all for a society that deserves a better tomorrow; with less sexual crimes, with more people coming out in confidence and voicing their opinions and experiences without the fear of being ostracized.

**BIBLIOGRAPHY**


