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THE LEGAL DYNAMICS OF DEFAMATION IN BNS: AN ANALYTICAL STUDY

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INTRODUCTION

Evolution from IPC to BNS

Defamation laws in India have undergone significant evolution, rooted in colonial-era legislation and now restructured under the *Bharatiya Nyaya Sanhita (BNS)*, 2023. Historically, defamation was governed by Section 499 and Section 500 of the Indian Penal Code (IPC), 1860, which provided a broad definition of the offense and prescribed criminal liability. Section 499 of the IPC classified defamation as an act that harms a person's reputation through spoken or written words, gestures, or visible representations. The provision was accompanied by Section 500, which imposed a punishment of simple imprisonment for up to two years, a fine, or both.¹

While the IPC's framework was comprehensive, it was often criticized for its criminalization of defamation, which many argued had a chilling effect on free speech, especially in matters concerning journalism, political discourse, and public opinion. In response to evolving societal norms and legal perspectives, the Government of India introduced the *Bharatiya Nyaya Sanhita (BNS)*, 2023, which replaced the IPC as part of a broader legal reform. Under the BNS, defamation laws have been restructured with modifications aimed at balancing individual reputation rights

¹ Thakral, Sahil, et al. "Impact of transition from IPC to BNS on toxicology laws in India." (2024): 133-136.

with freedom of expression.² Though the core principles of defamation law remain largely unchanged, the transition from IPC to BNS reflects an effort to modernize legal provisions in light of contemporary challenges such as digital defamation and the widespread influence of social media.

This shift marks a crucial moment in Indian legal history, as it reassesses the need for criminal defamation while retaining its penal provisions under the new legal regime. The transition also highlights India's ongoing debate between individual dignity and freedom of speech, a discourse shaped by significant judicial precedents and constitutional interpretations.

Importance of Defamation Laws in Protecting Reputation vs. Free Speech

Defamation laws serve as a delicate balance between two fundamental rights: the right to protect one's reputation and the right to freedom of speech and expression. The Constitution of India, under Article 19(1)(a), guarantees the right to free speech; however, this right is subject to reasonable restrictions under Article 19(2), which includes defamation as one of the permissible grounds for limiting free expression. The rationale behind defamation laws lies in the fundamental principle that a person's reputation is an essential component of dignity and must be safeguarded from unwarranted harm.³

At the same time, courts have consistently emphasized that defamation laws should not be misused as a tool to suppress dissent or curtail legitimate criticism. The Supreme Court of India, in *Subramanian Swamy v. Union of India* (2016)⁴, upheld the constitutional validity of criminal defamation, ruling that the protection of reputation is an integral part of the right to life under Article 21. The Court reasoned that while free speech is a cornerstone of democracy, it cannot extend to harming an individual's dignity and standing in society.

However, critics argue that criminal defamation laws, inherited from colonial times, are often weaponized by powerful individuals and institutions to silence journalists, whistleblowers, and

² Negi Advocate, Chitranjali. "Legal Evolution in India: Transitioning from Colonial Legacies to New Frontiers-An In-depth Analysis of Bharatiya Nyaya Sanhita, Bharatiya Nagarik Suraksha Sanhita, and Bharatiya Sakshya Bill in 2023." *Bharatiya Nagarik Suraksha Sanhita, and Bharatiya Sakshya Bill in* (2023).

³ Naik, Yeshwant. "The Bharatiya Nyaya Sanhita (BNS): A Critical Examination of India's New Penal Code." *Available at SSRN 4884622* (2024).

⁴ *Subramanian Swamy v. Union of India*, (2016) 7 SCC 221 (SC)

political opponents. Cases against journalists and activists have highlighted how defamation complaints can be used to stifle investigative reporting and public discourse. In contrast, civil defamation, governed by tort law principles, allows individuals to seek monetary damages instead of criminal penalties, offering an alternative mechanism for redress.⁵

With the enactment of BNS, the debate has intensified over whether criminal defamation remains necessary in modern India. The increasing use of social media has also led to new challenges in regulating online defamation, where reputational harm can occur instantly and on a global scale. The new legal framework under BNS must therefore address emerging issues such as fake news, cyber defamation, and the role of digital platforms in enabling defamatory content, while ensuring that the law does not unduly infringe upon free expression.

In conclusion, defamation laws in India have evolved as a means to protect individual dignity while grappling with the democratic need for free speech. The transition from IPC to BNS signifies an attempt to modernize these laws in light of contemporary realities, but the underlying tension between reputation protection and freedom of speech remains a contested legal and constitutional issue. The effectiveness of the new provisions under BNS will depend on how they are interpreted by the judiciary and whether they successfully prevent misuse while upholding fundamental rights.

DEFINITION AND SCOPE OF DEFAMATION

Defamation, as a legal concept, seeks to balance the right to freedom of speech with the protection of an individual's reputation. Under the *Bharatiya Nyaya Sanhita (BNS)*, 2023, defamation is primarily governed by Section 356, which replaces Sections 499 and 500 of the *Indian Penal Code (IPC)*, 1860. The provision criminalizes making or publishing statements that harm a person's reputation, whether through spoken words, written text, signs, or visible representations. The scope of defamation under BNS is broad, encompassing not only individuals but also deceased persons, companies, and associations.⁶

⁵ Kaur, Khushnoor. "Navigating the Legal Landscape: Defamation Laws in India." *Issue 2 Int'l JL Mgmt. & Human.* 7 (2024): 1620.

⁶ Sanders, Amy Kristin. "Defining defamation: Community in the age of the internet." *Communication Law and Policy* 15.3 (2010): 231-264.

Understanding Defamation under the Bharatiya Nyaya Sanhita (BNS), 2023)

The BNS provides a structured legal framework for defamation, retaining core principles from the IPC while introducing key modifications. Section 356 defines defamation as any imputation made with the intent to harm, or with the knowledge or reasonable belief that such imputation will harm, a person's reputation. The provision acknowledges various forms of defamation, including:

Oral and Written Defamation: Defamation can occur through spoken words, written statements, signs, or visible representations intended to damage a person's reputation.⁷

Defamation of Deceased Persons: If an imputation against a deceased person would have harmed their reputation if they were alive, and it is intended to hurt the feelings of their family or relatives, it constitutes defamation.

Defamation of Companies and Associations: The provision extends to legal entities, meaning that defamatory statements against a company, association, or collective group of individuals can also amount to defamation.⁸

Ironical and Alternative Imputations: Even if a statement is made indirectly or expressed in a seemingly harmless manner, such as irony or insinuation, it can still amount to defamation if it harms the reputation of the person concerned.

Reputation as a Legal Standard: The law provides that a statement harms a person's reputation if it lowers their moral, intellectual, professional, or social standing in the eyes of others. It also includes imputations that affect a person's standing in their caste, profession, or creditworthiness.⁹

The law recognizes that harm to reputation is subjective but should be assessed based on how the statement is perceived in society. Therefore, the test of defamation under Section 356 is whether the statement lowers a person's reputation in the estimation of others, making the societal viewpoint a determining factor.

⁷ Akhil Kumar, K. S. "The Bhartiya Nyaya (Second) Sanhita 2023: An Integrated Perspective-A Comprehensive Study and Analysis." *Jus Corpus LJ* 4 (2023): 350.

⁸ Chan, Gary KY. "Corporate defamation: reputation, rights and remedies." *Legal Studies* 33.2 (2013): 264-288.

⁹ Heymann, Laura A. "The Law of Reputation and the Interest of the Audience." *BCL Rev.* 52 (2011): 1341.

Key Differences Between IPC and BNS Provisions on Defamation

The *Bharatiya Nyaya Sanhita (BNS)*, 2023 largely retains the principles of defamation law from the *Indian Penal Code (IPC)*, 1860, but with some notable changes:

- **Introduction of Community Service as Punishment:** Under the IPC, defamation was punishable by simple imprisonment for up to two years, a fine, or both. The BNS retains this punishment but introduces community service as an additional penalty, aligning with a broader shift toward reformatory justice.¹⁰
- **Clarification of the Scope:** While the IPC provisions were often criticized for their broad and ambiguous language, BNS provides greater clarity regarding what constitutes defamation. The scope has been refined, particularly regarding defamation of deceased persons and organizations.
- **Digital and Social Media Defamation:** The IPC provisions on defamation were enacted in an era before digital communication. The BNS does not explicitly mention online defamation, but its broad phrasing implies that digital defamation—such as defamatory statements made on social media—would be covered under the law. This aligns with recent judicial interpretations that have extended defamation laws to online platforms.
- **Retaining Exceptions for Public Interest and Good Faith:** Like the IPC, the BNS includes ten exceptions to defamation, protecting statements made in public interest, good faith, judicial proceedings, fair criticism, and reporting of court proceedings. These exceptions play a crucial role in maintaining a balance between free speech and reputation protection.

Judicial Interpretations and Landmark Cases

Indian courts have consistently ruled on defamation cases, shaping the interpretation of defamation laws. Some key rulings that continue to be relevant under the BNS include:

Subramanian Swamy v. Union of India (2016)¹¹: The Supreme Court upheld the constitutionality of criminal defamation under IPC, ruling that reputation is a fundamental right

¹⁰ Kaur, Khushnoor. "Navigating the Legal Landscape: Defamation Laws in India." *Issue 2 Int'l JL Mgmt. & Human.* 7 (2024): 1620.

¹¹ Supra note 4.

under Article 21 of the Constitution and can be protected through reasonable restrictions under Article 19(2). This ruling reinforces the necessity of defamation laws even in the BNS framework.

Shreya Singhal v. Union of India (2015)¹²: While primarily addressing online speech restrictions under Section 66A of the *Information Technology Act*, this case highlighted the necessity of distinguishing between criticism and defamation, a principle that remains relevant in interpreting defamation laws under BNS.

Ram Jethmalani v. Subramanian Swamy (2006)¹³: The court emphasized that defamation laws must be interpreted carefully to avoid suppression of free speech while protecting genuine reputational harm.

Controversies and Criticism of Defamation Laws

Defamation laws in India have long been debated for their potential to curb free speech. Critics argue that criminal defamation provisions are often misused by powerful individuals and political figures to silence dissent. Some concerns include:

- **Chilling Effect on Free Speech:** The fear of criminal prosecution may deter individuals, journalists, and activists from expressing critical opinions, leading to self-censorship.¹⁴
- **Misuse by Politicians and Corporates:** High-profile defamation suits have been used as tools of intimidation against media houses and political opponents.
- **Need for Decriminalization:** Many legal experts advocate for defamation to be treated as a civil wrong rather than a criminal offense, aligning with practices in several democratic countries.

THE IMPACT OF BNS ON FREE SPEECH AND REPUTATION PROTECTION

The transition from the *Indian Penal Code (IPC), 1860* to the *Bharatiya Nyaya Sanhita (BNS), 2023* marks a crucial shift in India's criminal justice system, particularly in the realm of defamation. Defamation laws inherently balance two fundamental rights—freedom of speech and

¹² *Shreya Singhal v. Union of India*, (2015) 5 SCC 1 (SC)

¹³ *Ram Jethmalani v. Subramanian Swamy*, (2006) 1 SCC 1 (SC)

¹⁴ Rolph, David. "A critique of the national, uniform defamation laws." *Torts Law Journal* 16.3 (2008): 207-48.

expression (Article 19(1)(a)) and the right to reputation (Article 21). With the introduction of Section 356 of the BNS, there is a renewed debate on whether the law adequately upholds both rights or tilts in favor of one over the other.

This section examines how the BNS provisions on defamation impact free speech and reputation protection, analyzing key challenges, judicial perspectives, and contemporary concerns.

Balancing Free Speech and Reputation: A Constitutional Dilemma

Defamation laws have long been a contentious issue in India. Article 19(1)(a) of the *Constitution of India* guarantees the fundamental right to freedom of speech and expression, while Article 19(2) permits reasonable restrictions on this right in the interest of defamation, security of the State, public order, and decency or morality.¹⁵

Under the IPC, defamation was criminalized under Sections 499 and 500, which faced criticism for being vague, broad, and open to misuse. The introduction of Section 356 in BNS largely retains the same provisions, but its impact on free speech is subject to new interpretations.

Does Section 356 create a chilling effect on speech?

- Criminal defamation laws often discourage people—particularly journalists, authors, and political critics—from expressing opinions against powerful individuals and entities.
- The fear of criminal prosecution, imprisonment, or fines can lead to self-censorship, stifling public debate on important matters.

Is defamation a justifiable restriction under Article 19(2)?

- In *Subramanian Swamy v. Union of India* (2016)¹⁶, the Supreme Court upheld the constitutional validity of criminal defamation, ruling that reputation is a fundamental right under Article 21.

¹⁵ Blagoveshchenskiy, Sergey. "Protection of the Reputation: Its Role and Balance with the Right to Freedom of Expression." (2020).

¹⁶ Supra note 4.

- However, legal scholars argue that civil remedies (such as damages and injunctions) are more proportionate restrictions compared to criminal penalties, which can be used as a tool for harassment.

How BNS Addresses Reputation Protection

While the concerns regarding free speech persist, Section 356 of BNS attempts to protect an individual's right to reputation by:

1. Retaining Criminal Penalties:

- The provision continues to impose up to two years of simple imprisonment, a fine, or both for defamation.¹⁷
- This serves as a deterrent against false and malicious statements that can irreparably damage a person's reputation.

2. Expanding the Scope of Defamation:

- The BNS does not explicitly mention digital defamation, but its broad wording ensures coverage of social media posts, online articles, and digital publications.
- This is crucial in an era where defamatory statements spread rapidly through online platforms, often causing instant and irreversible reputational harm.

3. Retaining Exceptions to Prevent Misuse:

- The ten exceptions to defamation serve as safeguards for legitimate speech, including:
 - Truthful statements made in public interest
 - Fair criticism of public figures
 - Academic discussions and journalistic reporting

¹⁷ Kapetanidou, Ioanna Angeliki, Christos-Alexandros Sarros, and Vassilis Tsaoussidis. "Reputation-based trust approaches in named data networking." *Future Internet* 11.11 (2019): 241.

- This ensures that individuals cannot misuse defamation laws to silence criticism or suppress public debate.

Defamation in the Digital Era: A Growing Concern

One of the most significant challenges with defamation law today is its application to digital content. While Section 356 of BNS does not explicitly differentiate between traditional and digital media, courts have increasingly recognized online defamation as a serious issue.¹⁸

- **Rapid Dissemination and Virality:**

- Unlike traditional defamation, which might be limited to a newspaper or magazine circulation, social media defamation spreads globally within seconds.
- Even if defamatory content is later deleted, screenshots, shares, and archives ensure its continued impact.

- **Judicial Recognition of Online Defamation:**

- **Swami Ramdev v. Facebook, Google, and Twitter (2019)**¹⁹

- The Delhi High Court ruled that online defamation is subject to the same legal consequences as print or spoken defamation.
- The court directed social media platforms to remove defamatory content globally, setting a precedent for cross-border defamation cases.

- **Khushboo v. Kanniamal (2010)**²⁰

- The Supreme Court emphasized that mere offensive speech does not constitute defamation unless it lowers reputation in the eyes of right-thinking members of society.

¹⁸ Zukić, Melisa, and Abdurrahman Zukić. "Defamation Law and Media: Challenges of the Digital Age." *MAP Education and Humanities* 5 (2025): 98-109.

¹⁹ *Swami Ramdev v. Facebook, Inc. & Ors.*, 2019 SCC OnLine Del 10701 (Del HC)

²⁰ *S. Khushboo v. Kanniammal & Anr.*, (2010) 5 SCC 600 (SC)

- **Interplay with IT Laws:**

- Section 66A of the Information Technology Act, 2000, which criminalized offensive online speech, was struck down in *Shreya Singhal v. Union of India* (2015)²¹ for being vague and unconstitutional.
- However, platforms like Facebook, Twitter, and YouTube continue to face legal battles over defamatory content, with demands for stronger regulation under BNS and IT laws.

Abuse of Defamation Laws: Political and Corporate Misuse

Another major concern surrounding criminal defamation under BNS is its potential for misuse by politicians, corporations, and influential individuals.

- **SLAPP (Strategic Lawsuits Against Public Participation):**

- Powerful entities often file defamation cases against journalists, activists, and whistleblowers to silence criticism.
- High-profile examples include defamation cases against investigative media outlets exposing corruption or misconduct.²²

- **Judicial Stand Against Misuse:**

- The Supreme Court has repeatedly emphasized that defamation laws should not be used to suppress legitimate dissent.
- In *Rajagopal v. State of Tamil Nadu* (1994)²³, the court held that public officials and public figures must tolerate a higher degree of criticism.
- Courts have also ruled that mere injury to personal feelings does not constitute defamation unless actual reputational harm is demonstrated.

²¹ Supra note 12.

²² Pring, George W. "SLAPPs: Strategic lawsuits against public participation." *Pace Env'tl. L. Rev.* 7 (1989): 3.

²³ *R. Rajagopal v. State of Tamil Nadu*, (1994) 6 SCC 632 (SC)

THEORIES OF DEFAMATION

The concept of defamation has been analyzed through various legal, philosophical, and social theories, each providing a different perspective on why defamation laws exist and how they should be applied. These theories help in understanding the rationale behind protecting reputation while ensuring free speech is not unduly curtailed. Broadly, defamation theories can be categorized into moral, economic, political, and legal theories, which shape judicial interpretation and legislative frameworks across different jurisdictions.

i. Moral Theories of Defamation

One of the earliest justifications for defamation laws stems from moral philosophy. These theories argue that a person's honor and reputation are inherently valuable, and any false statement that harms them is a moral wrong that must be remedied.

A. Honor and Dignity Theory

- This theory asserts that an individual's reputation is an extension of their dignity and deserves protection against false accusations.²⁴
- Rooted in natural law principles, this theory finds strong backing in civil law systems (such as France and Germany), where honor is seen as an inalienable right.
- Indian jurisprudence has recognized reputation as part of the "right to life" under Article 21 of the Constitution, reinforcing this idea (*Subramanian Swamy v. Union of India*, 2016).

B. Retributive Justice Theory²⁵

- Derived from classical Kantian philosophy, this theory argues that wrongdoers should be punished simply because they have committed a moral wrong.
- Criminal defamation laws, which impose penalties beyond just monetary compensation, are often justified based on this retributive rationale.

²⁴ Yao, Jingjing, et al. "A measurement model for dignity, face, and honor cultural norms." *Management and Organization Review* 13.4 (2017): 713-738.

²⁵ Carlsmith, Kevin M., and John M. Darley. "Psychological aspects of retributive justice." *Advances in experimental social psychology* 40 (2008): 193-236.

Criticism:

- Critics argue that honor-based theories can be outdated, especially in societies where public figures are expected to withstand criticism.
- Applying a moralistic approach to defamation can lead to excessive restrictions on free speech, particularly in political or journalistic contexts.

ii. Economic Theories of Defamation

Some scholars view defamation through an economic lens, arguing that reputation has a tangible monetary value. False statements can negatively impact career prospects, business opportunities, and financial standing, making legal remedies essential.

A. Reputation as a Property Right²⁶

- This theory equates reputation with economic assets like property, arguing that individuals and businesses invest in building their reputation, which should be protected from harm.
- Common in corporate defamation cases, where companies sue for loss of goodwill, customer trust, and business damage.

Example:

- In *Tata Sons v. Greenpeace International* (2011), the Indian courts balanced corporate reputation with freedom of speech, particularly in cases involving activist criticism and fair comment.

Criticism:

- Treating reputation purely as a commercial asset may lead to over-legalization of speech, especially in cases involving satire, criticism, or public interest disclosures.

B. Market Efficiency Theory

²⁶ Aplin, Tanya F., and Ahmed Shaffan Mohamed. "The concept of 'reputation' in the moral right of integrity." *Journal of Intellectual Property Law & Practice* 14.4 (2019): 268-277.

- Developed in the United States, this theory argues that open communication is essential for an efficient marketplace, but false information distorts public perception, leading to poor decision-making.²⁷
- Thus, defamation laws exist to prevent falsehoods from disrupting markets while ensuring honest criticism is protected.

Example:

- In *New York Times v. Sullivan* (1964)²⁸, the U.S. Supreme Court ruled that public figures must prove "actual malice" to succeed in defamation claims, ensuring that fear of litigation does not stifle free debate on economic and political matters.

Criticism:

- This theory prioritizes economic efficiency but may fail to address personal dignity concerns, which remain central in non-commercial defamation cases.

iii. Political Theories of Defamation

Political theories focus on balancing free speech with state interests, often analyzing defamation in the context of government power, press freedom, and democracy.

A. Democratic Participation Theory

- This theory suggests that a well-informed citizenry is essential for democracy, and restrictions on speech (such as defamation laws) should be minimal to prevent censorship of political discourse.²⁹
- Courts in democratic nations often limit defamation suits by public officials, arguing that they should be subject to greater public scrutiny.

Example:

²⁷ Langevoort, Donald C. "Theories, assumptions, and securities regulation: Market efficiency revisited." *University of Pennsylvania Law Review* 140.3 (1992): 851-920.

²⁸ *New York Times Co. v. Sullivan*, 376 U.S. 254 (1964)

²⁹ Warren, Mark E. "What can democratic participation mean today?." *Political theory* 30.5 (2002): 677-701.

- New York Times v. Sullivan (1964) introduced the "actual malice" standard, requiring public officials to prove intentional falsehood or reckless disregard for truth in defamation claims.
- Indian courts have also upheld this principle in cases involving political defamation, emphasizing that criticism of public figures is necessary for democracy (*R. Rajagopal v. State of Tamil Nadu*, 1994).

Criticism:

- Defamation suits are still widely used in India by politicians to suppress dissent, leading to debates on whether stronger anti-SLAPP (Strategic Lawsuits Against Public Participation) protections are needed.

B. State Security Theory

- Some governments justify strict defamation laws on national security grounds, arguing that false information about government officials or institutions can destabilize society.³⁰
- This approach is common in authoritarian regimes, where defamation laws are used to suppress media freedom and dissent.

Example:

- Laws in China, Russia, and some Middle Eastern countries impose strict penalties for defamation against the government, often equating it with sedition or treason.
- In India, defamation suits have sometimes been used to curb investigative journalism and silence critics of public policies.

Criticism:

- This theory is heavily criticized for being anti-democratic, as it allows state actors to misuse defamation laws for political suppression.

³⁰ Hama, Hawre Hasan. "State security, societal security, and human security." *Jadavpur Journal of International Relations* 21.1 (2017): 1-19.

LEGAL THEORIES OF DEFAMATION

Legal theories analyze defamation from a jurisprudential standpoint, focusing on how laws should be structured to balance competing rights.

A. Balancing Theory

- This theory suggests that defamation laws should strike a balance between two competing interests:
 - The right to free speech (Article 19(1)(a) of the Indian Constitution).
 - The right to reputation (protected under Article 21 as part of the Right to Life).
- Courts often engage in case-by-case balancing, ensuring speech restrictions do not disproportionately impact free expression.³¹

Example:

- In *Subramanian Swamy v. Union of India* (2016), the Supreme Court ruled that criminal defamation is a reasonable restriction on free speech, but emphasized the need for fair application to prevent abuse.

Criticism:

- Critics argue that balancing theories often give more weight to reputation than speech, especially in political defamation cases.

B. Preventive vs. Punitive Approaches

- Some legal scholars argue that defamation laws should focus on preventing harm (injunctions, apologies) rather than punishing offenders (fines, imprisonment).

³¹ Wiesen, Daryl L. "Following the Lead of Defamation: A Definitional Balancing Approach to Religious Torts." *Yale LJ* 105 (1995): 291.

- The United Kingdom's Defamation Act, 2013, for example, reduced punitive elements and placed greater emphasis on public interest defenses.³²

Criticism:

- Purely preventive models may not sufficiently deter false and malicious speech, especially in digital defamation cases where damage can be widespread.

Theories of defamation highlight the complex interplay between free speech, personal dignity, economic interests, and democratic values. While some theories emphasize honor and reputation, others focus on economic consequences, political discourse, and legal balancing. Indian defamation law incorporates elements from all these theories, but the continued criminalization of defamation under Bharatiya Nyaya Sanhita, 2023, has sparked renewed debate over whether existing laws adequately protect both reputation and freedom of expression. As society evolves—especially in the digital era—a more nuanced and flexible approach to defamation law may be necessary to prevent misuse while upholding fundamental rights.

³² Panjaitan, Hulman, Inri Januar, and Petrus Irwan Panjaitan. "Public Opinion Regarding the Implementation of Restorative Justice on Compensation Sanctions as an Alternative to Imprisonment for the Crime of Defamation." *International Journal of Society Reviews (INJOSER)* 2.4 (2024): 869-881.