

**Submission on Respecting, Protecting and Fulfilling the Right to Freedom of Thought for the report of the Special Rapporteur on Freedom of Religion or Belief to the 76th Session of the General Assembly**

We would like to draw the attention of the Special Rapporteur on Freedom of Religion or Belief to certain documented incidents of violation of the absolute right of freedom of thought and belief, focusing on the **practices and policies that unduly affect freedom of thought of individuals in vulnerable situations**. We also urge the OHCHR to call on India to defend the human rights and freedoms that form the basis of a democracy and comply with its international human rights obligations.

**a) Children**

Nationwide protest against the discriminatory Citizenship (Amendment) Act 2019<sup>1</sup> saw huge mobilisation of people led by Muslim minorities India. In several parts of the country, these protests were met with arrests and brutal police violence, including that of minors (below the age of 18). According to a fact finding led by a civil society initiative, in the state of Uttar Pradesh, children were detained in violation of domestic laws, according to which no FIR can be filed against minors except in cases of heinous offence. 41 minors are/were detained and subjected to custodial torture. Of these, 22 minors were detained and tortured in district Bijnor and 14 minors in district Muzaffarnagar.<sup>2</sup> Various forms of torture such as sleep deprivation, denying them drinking water, food and toilet, making them witness violence on adults, beating them, hurling abuses against them and Islam and forcing them to say 'Jai Shri Ram' (a religious war cry of the Hindus). The minors were even threatened not to attend any more protests and to induce fear their mug

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<sup>1</sup> Citizenship (Amendment) Act 2019 allows Indian citizenship for Hindu, Sikh, Buddhist, Jain, Parsi, and Christian religious minorities who fled from the neighboring Muslim majority countries of Pakistan, Bangladesh and Afghanistan before December 2014 due to "religious persecution or fear of religious persecution". The Act specifically leaves out Muslims persecuted in these countries, thereby making religion a basis for citizenship.

See OHCHR, UN experts urge India to release protest leaders (26 Jun, 2020)

<https://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=26002&LangID=E>

<sup>2</sup><https://www.haqcrc.org/new-at-haq/brutalizing-innocence-detention-torture-criminalization-of-minors-by-up-police-to- quell-anti- caa- protests/>

shots were displayed publicly.<sup>3</sup> This was in direct violation of the national Juvenile Justice Act (2015), the rules made by central and the state government<sup>4</sup> and the United Nations Convention of Child Rights<sup>5</sup>, which India ratified in 1992. These minors were subjected to state violence, torture and illegal detention because of their membership to Muslim community and their expression of right to dissent against the discriminatory CAA 2019, thereby targeting their right to freedom of thought, religion and belief.

## **b) Girls, women, and LGBT+ persons**

Delhi witnessed a pogrom against Muslims in the month of February 2020<sup>6</sup> which lasted for around 4 days in which more than 50 people lost their lives and many got injured. Majority of the deceased, displaced or injured were Muslims. Similar to the sit-in protests led by Muslim women in Shaheen Bagh, people of North-East Delhi also started their sit-in protest against the CAA/NRC<sup>7</sup> in the Chaman Park and Jaffrabad region, and which saw maximum participation by women. The aftermath of violence saw many student activists being arrested by the Delhi police including many women activists. Stringent laws such as the Unlawful Activities (Prevention) Act, 1967 (UAPA) were imposed against them. **Gulfisha Fatima**, a student activist who was leading the sit-in protest at Jaffrabad was arrested by the police on 09.04.2020 and subsequently booked in another FIR under UAPA while still in custody. Gulfisha, who was not associated with any of the student organisations, was arrested by the police on the charges that she was a part of the conspiracy that led to violence. She was granted bail in one case but is still behind

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<sup>3</sup> Ibid

<sup>4</sup> [The Juvenile Justice\(Care and Protection of Children\) Act 2015](#) states that the police are required to bring the detention of the child to the notice of Juvenile Justice Board. The child should be placed in a special unit under the charge of the juvenile police unit. The minor is granted the right to privacy and public disclosure of the identity of the child is an offence.

<sup>5</sup> [UNCRC](#) prioritizes a child's right to freedom and peaceful assembly and has laid out guidelines against torture of children.

<sup>6</sup> <https://www.theatlantic.com/ideas/archive/2020/02/what-happened-delhi-was-pogrom/607198/>

<sup>7</sup> CAA when read in conjunction with the National Register of Citizens(NRC), which is a national record of all the legal Indian citizens, will disenfranchise the marginalised, specially the religious minorities, the dalits and women. Citizenship can be proved on production of certain documents, failing which people will have to appear before a tribunal to prove their citizenship, thus placing a huge cost on the already marginalised.

the bars under the UAPA charges.<sup>8</sup> **Natasha Narwal**, a student activist and a founding member of the women's rights organization Pinjra Tod, was arrested by the Delhi Police on 23.05.2020 for blocking the road near Jaffrabad Metro Station and for being a co-conspirator behind the violence in north-east Delhi. She has been booked under three FIRs including one under UAPA. Natasha applied for bail while her father was suffering from covid, but the same came up for hearing a day after he passed away in May '21. In the same hearing, she was granted interim bail by the Delhi High Court for three weeks to perform the last rites.<sup>9</sup> Another Pinjra Tod activist **Devangana Kalita** has been named in four FIRs filed by the Delhi police and has been granted bail in three of them. Both Devangana and Natasha were booked in the UAPA FIR on the day they were granted bail in the first FIR in which they were arrested. She has been denied bail under the UAPA along with Gulfisha, Natasha and other student activists. **Safoora Zargar** a research scholar of the Jamia Millia Islamia was also charged under the UAPA for being a co-conspirator behind the violence in north-east Delhi. Safoora was arrested when she was pregnant and was granted bail by the Delhi High Court<sup>10</sup>. Anti-caste activist and artist **Jyoti Jagtap** was arrested by the National Investigation Agency (NIA) on 08.09.2020<sup>11</sup> in the Bhima Koregaon case, more than two years after the registration of an FIR in which several activists, lawyers, academics have been arrested for allegedly inciting violence at a cultural event

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<sup>8</sup> Delhi riots: Granting activist Gulfisha Fatima bail, court says she's not flight risk, available at <https://indianexpress.com/article/cities/delhi/delhi-riots-jamia-student-gulfisha-fatima-gets-bail-7060476/>

<sup>9</sup> Activist Natasha Narwal surrenders after 3-week interim bail ends, available at <https://indianexpress.com/article/cities/delhi/activist-natasha-narwal-surrenders-after-3-week-interim-bail-ends-7337154/>

<sup>10</sup> Delhi High Court Grants Jamia Student Safoora Zargar Bail, available at <https://thewire.in/rights/safoora-zargar-bail-delhi-high-court>

<sup>11</sup> Bhima Koregaon: Singer Jyoti Jagtap of Kabir Kala Manch arrested in Pune, available at <https://scroll.in/latest/972539/bhima-koregaon-maharashtra-anti-terrorism-squad-arrests-activist-jyoti-jagtap-in-pune>

held in Pune on 31.12.2017.<sup>12</sup> She is lodged in the Byculla jail and tested positive for COVID-19 in April.<sup>13</sup> She still languishes in jail.

Online trolling of women activists, artists and journalists for exercising their freedom of thought and expression has become dangerously commonplace. Gauri Lankesh an Indian activist and journalist was murdered in 2017. She was subject to vicious online targeted hatred and gendered attacks before she was murdered.<sup>14</sup> Journalists like Neha Dixit have been physically stalked and have received rape and death threats.<sup>15</sup> Similarly, a Dalit-Christian artist Priyanka Paul has been repeatedly targeted for their beliefs and caste location.<sup>16</sup>

### **c) Disabled persons**

Several human rights defenders have been subject to incarceration under UAPA. Amongst these defenders are also people who, despite being disabled or critically ill, have been repeatedly denied bail. Father Stan Swamy, an octogenarian activist, suffering from Parkinson's disease -- which doesn't allow him to walk, hold a spoon, write or bathe -- has been incarcerated since October 2020 and remains behind bars for his alleged role in Bhima Koregaon<sup>17</sup> violence and alleged links to the banned Communist Party of India (Maoist) (CPIM).<sup>18</sup> He has been repeatedly denied bail on medical grounds, even as he awaits a trial.<sup>19</sup>

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<sup>12</sup> The Truth about the Elgaar Parishad What was it and who organised it?, CJP (Sept 1, 2018) available at <https://cjp.org.in/the-truth-about-the-elgaar-parishad/>

<sup>13</sup> Coronavirus | 38 inmates of Byculla jail test positive, available at <https://www.thehindu.com/news/cities/mumbai/coronavirus-38-inmates-of-byculla-jail-test-positive/article34379293.ece>

<sup>14</sup> The killing of Gauri Lankesh, available at [https://www.cjr.org/special\\_report/gauri-lankesh-killing.php](https://www.cjr.org/special_report/gauri-lankesh-killing.php)

<sup>15</sup> The Trolls Are Toxic: Why We Need to Take Online Harassment of Women More Seriously, available at <https://www.arre.co.in/gender/trolls-toxic-online-harassment-of-women/>

<sup>16</sup> Kangana Ranaut's comments on artist's tweet about depression cause internet storm, Twitter calls her 'most toxic' <https://www.hindustantimes.com/bollywood/kangana-ranaut-s-comments-on-artist-s-tweet-about-depression-cause-internet-storm-twitter-calls-her-most-toxic/story-47ckgzzWkljh6u8wDlv57l.html>

<sup>17</sup> American Bar Association urges courts to grant bail to Bhima Koregaon accused, available at <https://caravanmagazine.in/noticeboard/american-bar-association-urges-courts-to-grant-bail-to-bhima-koregaon-detainees>

<sup>18</sup> Who is Stan Swamy? available at <https://indianexpress.com/article/explained/who-is-stan-swamy-6717126/>

<sup>19</sup> Activist Stan Swamy seeks interim bail says he cant walk or eat, available at <https://www.thehindu.com/news/national/activist-stan-swamy-seeks-interim-bail-says-he-cant-walk-or-eat/article34613077.ece>

Similarly, a 90% disabled, wheelchair bound, former Delhi University professor has been incarcerated on charges of links with banned CPIM since 2016. G.N Saibaba was convicted by the Bombay High Court in 2017 and has been denied bail on medical grounds since.<sup>20</sup> He suffers from at least 19 ailments, many of which are life-threatening, and an undiagnosed lump is growing in his side. He suffers sharp pain while urinating, and has fallen unconscious from time to time in jail.<sup>21</sup>

Both the above cases highlight how human rights defenders in India are specifically targeted with anti-terror legislation for their dissenting thoughts and their ability to organise and register dissent. Fr. Swamy has relentlessly worked with the Tribal communities for their land and labour rights.<sup>22</sup> Whereas, Saibaba has extensively campaigned against the Salwa Judum militia in Chhattisgarh and the human rights violations that accompanied Operation Green Hunt against Maoists in central India.<sup>23</sup>

Labour activist and industrial worker Shiv Kumar, the president of Mazdoor Adhikar Sanghatan (Workers' Rights Union), is visually disabled in his right eye.<sup>24</sup> He was subjected to brutal custodial torture after he was picked up<sup>25</sup> from the farmers' protest site at Singhu border near Delhi on 16.01.2021. Kumar was illegally detained for a week before being produced before the magistrate.<sup>26</sup> He was demonstrating in solidarity with the ongoing farmers' protests against the amendment in the farmers laws by the central government. Kumar was released

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<sup>20</sup>G.N Saibaba being denied adequate medical care and life of dignity in prison, available at <https://scroll.in/article/880290/why-is-gn-saibaba-being-denied-adequate-medical-care-and-a-life-of-dignity-in-prison>

<sup>21</sup> ibid

<sup>22</sup>Who is Stan Swamy? Available at <https://indianexpress.com/article/explained/who-is-stan-swamy-6717126/>

<sup>23</sup>G.N Saibaba being denied adequate medical care and life of dignity in prison, available at <https://scroll.in/article/880290/why-is-gn-saibaba-being-denied-adequate-medical-care-and-a-life-of-dignity-in-prison>

<sup>24</sup> Beaten, not broken: Meet Shiv Kumar and Nodeep Kaur, young labour activists inspired by Bhagat Singh, available at <https://scroll.in/article/989447/beaten-not-broken-meet-shiv-kumar-and-nodeep-kaur-young-labour-activists-inspired-by-bhagat-singh>

<sup>25</sup> Shiv Kumar was picked up from near the farmers' protest site in Singhu on 16.01.2021, however the Haryana Police claims that he was arrested only on 23.01.2021

<sup>26</sup> Torture-like wounds on held Dalit activist available at <https://www.telegraphindia.com/india/farmers-protest-torture-like-wounds-on-held-activist/cid/1807886>

on bail on 04.03.2021.<sup>27</sup> Noting that the constitution guarantees protection to life and personal liberties, the Punjab and Haryana High Court ordered a judicial probe into the alleged custodial torture of Kumar which left him with two fractures on his hand and foot and broken nail beds of his toes.<sup>28</sup>

The actions of the Government of India limiting and punishing the Freedom of Thought must be read in conjunction with the United Nations Convention on the Rights of the Persons with Disabilities, which India has ratified. Additionally, the United Nations Standard Minimum Rules for the Treatment of Prisoners also urges prisons to ensure prompt medical access in urgent cases, which in case of these political prisoners have been compromised. Earlier, UN rights experts through the OHCHR urged India to release rights defender Dr. G.N. Saibaba on health grounds.<sup>29</sup> Mandates of the Working Group on Arbitrary Detention; the Special Rapporteur on the situation of human rights defenders and the Special Rapporteur on minority issues had written to the government of India on prolonged detention of Fr. Swamy.<sup>30</sup>

#### **d) The elderly**

15 of the 16 political prisoners remain in pre-trial detention in Maharashtra prisons for their alleged involvement in the violence against Dalits at Bhima Koregaon on 1 January 2018.<sup>31</sup> Many of these incarcerated activists are at severe risk during

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<sup>27</sup> Beaten, not broken: Meet Shiv Kumar and Nodeep Kaur, young labour activists inspired by Bhagat Singh, available at

<https://scroll.in/article/989447/beaten-not-broken-meet-shiv-kumar-and-nodeep-kaur-young-labour-activists-inspired-by-bhagat-singh>

<sup>28</sup> HC orders probe into 'custodial torture' available at

<https://www.hindustantimes.com/cities/chandigarh-news/hc-orders-probe-into-custodial-torture-101615923123181.html>

<sup>29</sup> UN experts urge India to release rights defender Dr. G.N. Saibaba on health grounds, available at

<https://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=23284&LangID=E>

<sup>30</sup> Mandates of the Working Group on Arbitrary Detention; the Special Rapporteur on the situation of human rights defenders and the Special Rapporteur on minority issues, available at

<https://spcommreports.ohchr.org/TMResultsBase/DownloadPublicCommunicationFile?gld=25658>

<sup>31</sup> A quick recap of Elgaar Parishad case that NIA has now taken over, Indian Express (24 Jan, 2020), available at

<https://indianexpress.com/article/explained/explained-a-quick-recap-of-elgaar-parishad-case-that-nia-has-now-taken-over-6233866/>

Of the 16 people who have been arrested so far, Vara Vara Rao, 81, was granted temporary bail in February 2020 for six months.

the pandemic given the conditions of jail and their fragile health. Vernon Gonsalves (61), Varavara Rao (81), Anand Teltumbde (68), Gautam Navalakha(68), Sudha Bharadwaj (60), Hany Babu (55), Fr. Stan Swamy (83) and Shoma Sen(60) have been repeatedly denied bail under UAPA, even as they await their trial.<sup>32</sup>

***Prison Conditions in Maharashtra:*** The jails in which the accused in the Bhima Koregaon case are lodged, as well as others across Maharashtra, suffer from overcrowding and continue to be overcrowded despite order of courts to decongest and its implementation as well.<sup>33</sup> The quarantine facilities created for inmates are more congested than prison barracks and lack basic facilities like adequate water. Prisoners are examined by Ayurvedic doctors instead of allopathic doctors. Most quarantine centres do not have doctors or appropriate health workers.<sup>34</sup>

#### **e) Members of minority religious or belief communities**

The government has used the current pandemic situation to systematically target those who participated in anti-CAA protests, especially the Muslims. The witch-hunting of Muslim youths by invoking anti-terror and other draconian laws<sup>35</sup>, which come with stringent bail procedures, has resulted in their indefinite incarceration. Several Muslim activists are facing endless harassment, interrogation and torture. Many of them, Umar Khalid, Sharjeel Imam, Meeran Haider, Asif Iqbal, Shifa-ur-Rahman, Khalid Saifi, Gulfisha Fatima, Ishrat Jahan and others are still behind the bars as they have been denied bail by the court.

The US commission for International Religious Freedom (USCIRF) expressed its concerns about the Indian government arresting Muslim activists during the Covid-

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<sup>32</sup>Concerns over detention of civil rights activists during Covid 19, available at <https://caravanmagazine.in/noticeboard/international-concern-over-detention-of-civil-rights-activists-during-covid-19>

<sup>33</sup> Faisal Tandel, Maharashtra: Jails remain overcrowded despite Bombay High Court Orders, available at <https://www.freepressjournal.in/mumbai/maharashtra-jails-remain-overcrowded-despite-bombay-high-court-order>

<sup>34</sup> Sukanya Shantha, *In Maharashtra, Prison Quarantine Centres Are More Harrowing than Main Jail Barracks*, The Wire (2 June, 2021) available at <https://thewire.in/rights/covid19-maharashtra-prison-decongest-quarantine>

<sup>35</sup> UAPA (1967), and [National Security Act \(1980\)](#)

19 crisis, specifically the ones who protested against the contentious Citizenship (Amendment) Act 2019. The USCIRF tweeted<sup>36</sup> "*At this time, India should be releasing prisoners of conscience, not targeting those practicing their democratic right to protest*".

The Observatory for the Protection of Human Rights Defenders along with the International Federation of Human Rights had also requested intervention against the arbitrary detention of seven human rights defenders in Delhi in relation to their participation in peaceful protests against CAA 2019.<sup>37</sup>The Observatory expressed its concerns "about the arbitrary detention and judicial harassment...aimed at punishing and intimidating them [the activists] for their legitimate human rights activities and the exercise of their rights to freedoms of expression and of peaceful assembly."<sup>38</sup>

In a bizarre case of stifling minority thought and voices, on 1st January 2021, a Muslim comedian Munawar Farooqui was arrested from Indore in Madhya Pradesh, India for allegedly cracking a joke insulting Hindu gods, based on a complaint filed by the son of a BJP minister. Two days later, the Town Inspector of the police station admitted that there was no evidence that the joke was made by him and that he was booked as an organizer. He was booked under sections 295A, 298, 269 and 188 read with 34 of the Indian Penal Code<sup>39</sup>. The police chief of Indore, reiterated that Farooqui was arrested on the basis of his "intent" to make offensive remarks against the Hindu deities.<sup>40</sup> Farooqui and four of his associates were denied bail and sent to judicial custody. A sessions court and later the High

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<sup>36</sup> <https://www.dawn.com/news/1557104>

<sup>37</sup> Arbitrary detention of several human rights defenders for protesting against the Citizenship Amendment Act available at <https://www.omct.org/en/resources/urgent-interventions/arbitrary-detention-of-several-human-rights-defenders-for-protesting-against-the-citizenship-amendment-act>

<sup>38</sup> *ibid*

<sup>39</sup> How An Indian Stand Up Comic Found Himself Arrested for a Joke He Didn't Tell available at <https://time.com/5938047/munawar-iqbal-faruqui-comedian-india/>

<sup>40</sup> Muslim Comic Did Not Joke About Hindus, But 'It Doesn't Matter': Police Chief, available at <https://www.article-14.com/post/muslim-comic-did-not-joke-about-hindus-but-it-doesn-t-matter-police-chief>



Court of Madhya Pradesh rejected his bail<sup>41</sup> on grounds of law and order. Later, Farooqui was granted interim bail by the Supreme Court of India<sup>42</sup> on 5th February 2021. However, his four associates were granted interim bail only later, with two of them being released on bail after 2 months in judicial custody.<sup>43</sup>

Similarly a Delhi based Muslim journalist, Siddique Kappan was arrested along with three others, as they were on their way to cover the alleged rape and murder of a 19 year old dalit girl in Hathras, Uttar Pradesh.<sup>44</sup> They were booked under sections 124A (sedition), 153A (for promoting enmity between groups) and 295A (outraging religious feelings) of the IPC, sections 14 and 17 of UAPA, sections 65, 72 and 76 of the Information Technology Act.<sup>45</sup> Kappan was arrested on 5.10.2020 and his bail application has been repeatedly dismissed.<sup>46</sup> In April 2021, he contracted Covid-19 virus and was also suffering from multiple health issues like diabetes, heart ailment, blood pressure and bodily injury<sup>47</sup>. He was being treated at KM Medical College Hospital in Mathura, where according to his wife, he had been kept handcuffed to the hospital cot for four days and was not being allowed to use the toilet.<sup>48</sup> On a petition filed by her in the Supreme Court, the Uttar Pradesh government was directed by the Supreme Court to shift him to AIIMS Delhi to receive better medical care, only to be hastily moved back to

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<sup>41</sup> [Comedian Munnwar Farooqui bail plea dismissed from High Court, preparations to go to Supreme Court](#)

<sup>42</sup> Supreme Court Grants Interim Bail to Comedian Munawar Faruqui, available at <https://thewire.in/rights/supreme-court-grants-interim-bail-to-comedian-munawar-faruqui>

<sup>43</sup> Last 2 in Munawar Faruqui case get bail after 8 weeks in jail available at <https://timesofindia.indiatimes.com/india/last-2-in-munawar-faruqui-case-get-bail-after-8-weeks-in-jail/articleshow/81236425.cms>

<sup>44</sup> Hathras Case: Malayalam Journalist and Three Others Booked Under Sedition, UAPA available at <https://thewire.in/media/hathras-case-malayalam-journalist-siddique-kappan-booked-under-sedition-uapa>

<sup>45</sup> *ibid*

<sup>46</sup> 122 days & 6 adjournments later, Siddique Kappan's habeas corpus plea still pending in SC, available at <https://theprint.in/judiciary/122-days-6-adjournments-later-siddique-kappans-habeas-corpus-plea-still-pending-in-sc/598289/>

<sup>47</sup> By Hastily Shifting Siddique Kappan From AIIMS to Mathura Jail, UP Defies Supreme Court, available at <https://thewire.in/law/by-hastily-shifting-siddique-kappan-from-aiims-to-mathura-jail-up-defies-supreme-court>

<sup>48</sup> Some Oxygen For Siddique Kappan, Please? Available at <https://www.outlookindia.com/website/story/opinion-some-oxygen-for-siddique-kappan-please/382579>

Mathura jail in Uttar Pradesh by the UP Government. Mathura district jail houses 1,700 prisoners against a capacity of 554, making him more vulnerable given his fragile health and situation of the pandemic. Kappan is now seeking regular bail in Mathura District Court.<sup>49</sup>

### **How have regional human rights courts, UN human rights mechanisms and domestic courts interpreted and applied freedom of thought?**

70% of the global internet shutdowns in 2020 were in India. This was the third time in a row that India topped the list of global internet shutdowns by governments.<sup>50</sup> After the abrogation of the special status of the disputed territory Jammu and Kashmir on August 5th 2019, India imposed a communication blackout in form of suspending mobile phone networks, internet and even cable TV network in the valley citing security concerns and fearing a backlash in form of protests. The UN criticised it as a form of “collective punishment” and asked it to be reversed.<sup>51</sup> Despite the urgency of fast internet to access information and save lives given the emerging situation of Covid-19 pandemic<sup>52</sup> India denied 4G internet to the disputed territories of Kashmir throughout 2020.<sup>53</sup> In response to a petition filed by journalist Anuradha Bhasin, the Supreme Court of India in *Bhasin vs. Union of India 2019*, upheld that the access to internet falls under Article 19 of the Indian constitution and any suspension of rights under this article should stand the test of necessity and proportionality. However, the court did not order a restoration of the internet

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<sup>49</sup> Kerala Journalist Siddiqui Kappan Moves Mathura District Court Seeking Regular Bail, available at <https://www.livelaw.in/news-updates/kerala-journalist-siddiqui-kappan-moves-mathura-district-court-seeking-regular-bail-175024>

<sup>50</sup>70 percent of the global internet shutdowns in 2020 were in India <https://timesofindia.indiatimes.com/india/70-of-global-internet-shutdowns-in-2020-were-in-india-report/articleshow/81321980.cms>

<sup>51</sup> UN rights experts urge India to end communications shutdown in Kashmir, available at <https://news.un.org/en/story/2019/08/1044741>

<sup>52</sup> Majid, Maqbool (2020). ‘An Hour to Download ICU Guidelines’: Amid COVID-19, Kashmir Doctors Struggle With Slow Internet. The Wire. available at <https://thewire.in/rights/coronavirus-kashmir-slow-internet>.

<sup>53</sup> #KeepItOn Campaign, available at [https://www.accessnow.org/cms/assets/uploads/2021/03/KeepItOn-report-on-the-2020-data\\_Mar-2021\\_3.pdf](https://www.accessnow.org/cms/assets/uploads/2021/03/KeepItOn-report-on-the-2020-data_Mar-2021_3.pdf)

to Jammu and Kashmir, and asked the government to review the orders against the test outlined.<sup>54</sup>

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<sup>54</sup> Bhasin vs Union of India 2019 available at <https://globalfreedomofexpression.columbia.edu/cases/bhasin-v-union-of-india/>