Questionable Information, Discrimination, and Police Brutality during COVID-19 Pandemic

Souvik Mukherjee, Abhra Jena and Vikramjit Mullick

Abstract

SARS-CoV-2 has turned the world on its head in less than six months. The disease has engulfed the world, irrespective of economic standing, medical infrastructure or military prowess. India too has fallen prey to this disease and is currently in the midst of battling it. As the battle intensifies against this ominous pandemic, India, in addition to the extensive scientific and medical research undertaken, has started taking several supporting steps in the form of janta curfew, nationwide lockdown, travel bans, lighting diya, banging of utensils etc. to curb the widespread of COVID-19 and boost the morale of people. Since the inception and more specifically in the last few weeks, the country has witnessed certain stark anomalies while implementing measures like social distancing and awareness programs. These anomalies ran contrary to basic human rights and constitutional principles.

The paper undertakes a brief and specific study of instances of violation of basic legal and constitutional principles and underlines the legal recourse against such violations. The paper also examines the principle and scope of the concept of secularism, limitations of police powers, quality of information and questionable content distributed and introduced in the information system and challenges thereto. From a holistic point of view, the article attempts to address the growing concern violating basic human rights of the people of India amidst this coronavirus outbreak.

1. Introduction

"Everyone has a plan until they get punched in the mouth", the famous quote by Mike Tyson, could not have been more relevant than now. As the world grapple with the pandemic named COVID-19, nation state's governments have been busier than ever, trying to come up with plans to react positively to this pandemic. Realization of the importance of research on science and medicine and the significance of the robust health care system is unprecedented. The existence of human coronavirus can be traced to the year 1965 when it was named as B814[i]. Time and again humankind has been revisited by viruses leading to respiratory diseases, the latest being in the form of COVID-19.With the introduction of COVID-19, the so-called developed nations which are categorized as 'economic powerhouses' with state-of-art research and health care systems, and a plethora of arms and ammunition to burn down the world several times, are struggling to address the pandemic. Developed Countries have fared worse some developing countries. Governments, virologists, scientists, health care workers, sanitation workers, media workers, the police force are all working hand in

hand to "flatten the curve". Due to the highly contagious nature and severity of the disease coupled with lack of treatability measures and poor health care infrastructure, prevention of the spreading remained the most viable option for developing nations like India. Indian Prime Minister invoking Disaster Management Act, 2005, announced a nation-wide lockdown while the State governments resorted to Epidemic Diseases Act, 1897 to frame rules, regulation and guidelines for the prevention of COVID-19 even though it was expected to cause an adverse impact in the economy. However, the economic dip could be considered as a fair price to pay for saving thousands of lives, if the mitigation efforts are successful. What was not taken into account at the inception of lockdown was the possibility of violation of human rights and constitutional principles in the form of excessive force used by the police power or questionable content circulated over social media or religious or racial discrimination being propagated. In this article, the authors intend to bring forth the extra COVID-19 challenges which are of no less concern than the disease itself and are to be addressed simultaneously. Not addressing these would significantly mar the battle against COVID-19. The article is divided into five segments; Introduction is followed by a section on Information System, Social Media and Questionable Content in India, in the time of COVID-19, Fine line between Social Distancing and Discrimination, Police Support aided by Police Brutality and finally Conclusory Remarks.

2. Information System, Social Media and Questionable Content in India in the time of COVID-19

Over 500 million Indians are considered to be active users of the Internet as of 2019[ii], while the number of social media users are exceeding 350 million[iii]. The number of users is only expected to go higher in the years to come. However, since the majority of Indians are still receiving their share of news and information through the offline medium, it is imperative we look at their source of information, and the role and impact of questionable online information, in both online and offline information consumption. In this segment, we will engage in the study of the quality of information and questionable information regarding COVID-19 circulated online and offline, and the impact of dissemination of this questionable information.

The lack of information, knowledge and research on COVID-19 gave rise to misinformation and questionable content, both online and offline, ranging from the religious narrative of 'judgment day 'dawning upon humankind to punish them for the sins[iv] to political narrative of COVID-19 being a man-made bioweapon[v]. Between the ranges, lay a plethora of questionable content, capable of feeding on the insecurities of educated and uneducated alike. When it comes to non-internet-based dissemination of information, televised advertisements[vi], radio[vii], poster campaign in multiple languages[viii], informative cartoon books for children[ix], leaflets for public distribution[x], TV &

Radio Spots[xi], etc. have been the primary media. Besides these, there has been evidence of individuals announcing and spreading awareness about COVID-19 and lockdown and do's and do not's during this pandemic. With such extensive measures, it is expected that people who are not connected to the world through the internet would follow the instructions and act prudently. However, the question arises as to why some people are refusing to stay at home and defying the lockdown orders[xii]?Why are people still gathering in mass? Why are migrants out of their house and attempting to cover thousands of miles from an industrial workplace to their respective hometowns? Why aren't the people with symptoms of COVID-19, voluntarily submitting themselves for tests[xiii]? Is it possible that their judgment and power to reason is clouded by the barriers of misinformation circulating over the information system online and offline, through word of mouth, their own experience with their surroundings?

There is a general assumption that all those who don't have access to the internet are immune to misinformation or questionable content. However, we fail to realise that rumours and questionable content are not a by-product of the internet age --the practice exists since long. Hence, individuals without access to the internet may not be subjected to questionable online misinformation directly but will be exposed to misinformation through word of mouth. This is coupled with observation of the behavioral pattern of the so-called "literate and educated individuals" making them an indirect victim of misinformation and influence their actions. There have been efforts from community radio and government to curb the menace; still, questionable information continues to largely hover on the people. While a significant number of the population remains indoors respecting the lockdown and saving lives, while honing culinary skills, engaging in board games, online games, social networking, and exploring the possibilities of work from home, there lies a large section of the population who are far from their comfort of home, living in slums. Groups of 7-10 individuals holed up in a single room, do not have the Luxury of social distancing, have no opportunity to earn their daily wages by working from home and have nothing to send back to their needy families back home[xiv]. The psychological unrest which exists amongst these migrants is not relatable for the population that can virtually carry out their jobs from their homes. Awareness programs conducted by government irrespective of the media have only limited reach to this set of population. With such a diverse set of the population, from a cultural, socio-economic and religious perspective, is it appropriate to expect a standard and uniform impact on people of the government-run advertisements? On one hand, we have a population that is in regular interaction with the internet and have the comfort of home and basic amenities being taken care of, on the other we have a mixed population where all the individuals do not have digital footprints, living far away from their family, earning daily wages and limited sense of security. Dissemination of information may not

always be enough to cater to fundamental rights; the quality, standard and medium of information depend much on the recipients. This set of the population depending upon offline resources are suffering from certain limitation. If those limitations are not taken into the account while disseminating information to this population, even real information has the potential to be misconstrued as misinformation and questionable content due to the quality of reception and self -contextualization.

The menace of questionable information is far more apparent over social media, and online news portals. At the international scale, the top myths which circulated over the internet were (a) COVID-19 is Just another flu; (b) Heat kills COVID-19; (c) Home remedies can cure COVID-19(d) Origin of COVID-19 being a Bio-weapon, (e)The vaccine already exists for COVID-19[xv], these myths have been successfully debunked and a large section of the population have disengaged from such narratives. However, the damage of these questionable contents continues to hover around, now and then. While it has been evidenced through research that questionable content is primarily floated for ideological propagation or pecuniary benefit, but the pandemic in question brought eminent figures and national leaders actively participating and contributing to the questionable contents. Donald Trump, the President of the United States of America urged the use of hydroxychloroquine, to counter COVID-19, without any hard evidence at his hand regarding its efficacy[xvi]. The President in question had not

stopped at that, excerpts of a series of tweets on a microblogging site called twitter, showed that he on a regular interval delivered questionable content over social media[xvii]. Misinformation and questionable content have not only derailed scientific research and medical developments but also impacted several other rights which are inalienable. Accidental deaths[xviii], Religious discrimination[xix], racial discrimination[xx], abuse of the right to information[xxi], police brutality[xxii], mass disinfection of individuals[xxiii], marginalization based on race and region[xxiv] etc. all could be apportioned to the questionable contents circulating over the information system. The Indian government has proactively engaged in debunking misinformation, fake news and questionable contents through a dedicated window for a fact-check[xxv].Through this portal, tweets and other questionable news with respect to governmental measures can be verified and true position can be ascertained. Facebook and other social media have their share of tie-ups with third-party fact-checkers[xxvi] and have been playing an essential role to curb fake news. Nonetheless, the menace continues. There have been portals and dedicated account numbers which may assist in fact-checking. However, the problem continues to plague, due to the nature of the content, which feeds on insecurities or reaffirms belief which acts as the psychological resistance to put the effort to question it and verify it[xxvii]. A mind incapable of making critical approach is automatically barred from active participation in the process of fact-checking[xxviii]. Furthermore, the styling and content are targeted to

31

such vulnerable individuals, that it is getting well spread due to its unique feature of being able to travel at a faster speed[xxix] through the algorithm of social networking before it is check. Thus, the whole scheme of information system, offline or online needs a re-look from the perspective of the actor, rationale, medium, and recipient (ARMT). To eliminate the challenges of questionable information, a multifaceted approach involving customized awareness program to effectively provide information, enable mass to think critically and not be mere machine line product along with robust fact-checking systems are imperative.

3. The Fine line between Social Distancing and Discriminatory Behavior

COVID-19 brought a unique situation before the world, were not only fellow countrymen, but all of humankind declared that they are together in the fight against COVID-19, the behaviour mirrors plot points from popular Hollywood film where the world is under threat from aliens and together they fight it off, albeit the US leading the way. COVID -19 brought forth such an emergent situation that the countries are facing such an enemy who is is one without any religion, nationality or ideology, it did not target based on one's race or socioeconomic status, the disease has been the most indiscriminate in choosing its target.

India, suffering through a significant turmoil over religion and political issue over the past few months, has been no exception from the being an indiscriminate target of the disease. The pandemic situation prevailing currently provided the best opportunity to bring down the conservative and toxic thoughts of several people. The virus had paradoxically, provided an opportunity for healing of the partisan wounds. With measures such as "Janta curfew" and lockdown, Indian Government showed took a strong position against the pandemic and resolution to protect human life. Through social media individuals in India showcased their solidarity against COVID-19 through several acts such as lighting Diya[xxx] and banging utensils[xxxi] from their respective balconies, while that being inspirational and reflect the seriousness of the pandemic, could not be categorized as a complete story.

Days after the announcement of 21days lockdown it was learnt that there was a congregation of Tablighi Jamaat at Nizamuddin Markaz, Delhi from 13th - 15th March 2020, at the Somnath Temple, Gujarat, has seen around five thousand (5000) devotees per day between 18th and 19th March 2020[xxxii], just a few days after the Nizamuddin gathering. Besides religious gathering, there were wedding ceremonies with thousands of attendees, involving relatives of political leaders irrespective of their alliance[xxxiii], and birthday parties by the common man[xxxiv].These acts reflect anything but an act of social distancing.

The trouble starts when the solidarity India showed, while lighting *Diya* and gave the hope that India is capable of fighting the battle together irrespective the diversity, goes out of the window, the moment the people stopped viewing the victims of COVID-

32

19 as patients, rather perpetrators of spreading the disease and associate them with their particular belief system. It has been seen that following, the reporting of Tablighi Jamaat gathering, lead to the circulation of a large number of questionable contents through videos and news, which showed the believers of the Islamic faith in a negative light, with the hashtag "corona jihad" appearing for lakhs of times being viewed by millions of people since 28th of March, 2020[xxxv]. While only limited media coverage could be seen with regard to the temple gatherings. Separate events, different religions, one not forming the majority of the population gets negative media attention and being considered scapegoat for the spread of the disease and circulation of material condemning the whole religion for it; while the other religion forming the majority of the population, holds similar gathering prior to the announcement of lockdown gets limited media attention. Reports say that a case of criminal conspiracy has been filed against the organizers of the Nizamuddin gathering for violating the Central Government Guidelines to strictly follow social distancing[xxxvi] while no reports of similar action against the ones responsible for mass gathering at religious institutions have surfaced yet. To make matter worse some eminent political party leaders accused Tablighi Jamaat of carrying out a "Talibani crime", described their members as "human bombs, but in the guise of coronavirus patients", and called for Tablighi Jamaat leaders to be both hanged and shot. While another leader tweeted: "Tablighi Jamaat people have begun spitting on the doctors and other health workers. It's clear, their aim is to infect as many people as possible with coronavirus and kill them"[xxxvii].As said by the Chairman of the Islamic Center of India, Khalid Rasheed, even after the pandemic gets over, the virus of communal disharmony will be very hard to kill[xxxviii] and the of secularism envisioned in the preamble and fundamental rights would be nothing but lost, thereby leading to further communal tension in India. Pandemic COVID-19 demanded social distancing and solidarity, however, what we have experienced that a single event, when propagated with religious colour and aided with questionable information, is capable of spreading "Islamophobia" and discriminatory treatment. Such treatment towards any religious community can be anything but an act of solidarity against the pandemic.

The elements of unfair and discriminatory treatment are not based on religion alone as citizens of the country continued to experience marginalisation and discrimination. It is reported that the families of the Yanadi community, residing in a village in Vijayawada, Andhra Pradesh, working mainly as waste pickers, drain cleaners, etc., were segregated way before the outbreak of COVID-19, since they belonged to the Dalit community. These poor people due to their social status have been banned to go downhill for the purchase of essential commodities[xxxix].Furthermore, the people from North-East have been subject to increased discrimination, a lady from Sikkim residing in Kolkata was questioned whether if she belonged from China and was asked to undergo COVID-19

test just because of her appearance though she had no symptoms of the deadly virus and was suffering from a mild urinary tract infection[xl]. In a report shared by social activist and lawyer Alana Golmei, an incident took place in Vijay Nagar, Delhi, where a Manipuri woman who in her early 20s was teased by calling her "corona" and spat by a man in a two-wheeler[xli]. Such, feeling of resentment and marginalisation is plaguing and weakening the solidarity India as a country had shown at the beginning of the fight against the COVID-19.

While the lockdown measure, was a reflection of the government's commitment to the preservation of life and prevention from the spread of COVID-19, an oversight about the status of migrant workers and daily wage earners, seems to have become the biggest violation of human rights and constitutional principles which Indian Constitution stands for. A significant share of the population with limited means and education in their kitty has left their homes for urban and industrial areas in search of work and undergoes daily struggle to survive and provide for dependents back home. Around 45 million migrant workers are left listless and clueless since the lockdown, some have started to reach their hometown on foot with child on the shoulder, some without a roof, some without means to purchase livelihood and most without job or means of livelihood or any form of security[xlii]. There was a huge crowd of more than thousand migrant workers were witnessed in the Bandra railway station, with only one demand from the government i.e. to make provisions of sending them back home since they were trapped and they did not have any means to return home during the extension of the lockdown[xliii].The efforts of the Governments to prevent the spread of disease are undoubtedly laudable and brave, but the question may arise about the preparedness and use information system during the lockdown. While a section of the population is sitting safely behind their closed doors with the option of working from home and other activities to keep themselves occupied and maintain sanity, this large set of population, who enjoy equal citizenship right as any other enjoying higher socioeconomic status, are struggling to survive. This set of the population is not well informed or educated or have any form of security. The Governmental steps for spreading awareness are uniform and fail to take the comprehension capacity of the diverse target audience and their insecurities. The panic behaviour amongst the people from higher socioeconomic status leads to further distrust in the information they receive. These people are just as scared as anyone else, maybe even more as they are far from their loved ones and no means to reach them. The fear they share is not only for 'today' but also extends to their future, as per reports, approximately over 80% of the country's daily wage workers are at constant fears of running out of food and other essential goods[xliv]. "It is a matter of utmost fear and concern that they will not be able to find work once the lockdown ends, found Jan Sahas, which surveyed 3,196 migrant and daily wage workers across Northern and Central India between March 27 and 29"[xlv]. Lockdown, a measure to ensure social

34

distancing if have shown anything other than prevention from the spread of the pandemic[xlvi], is a collective apathy towards the situation of migrants[xlvii].

Secularism, Principles against Racism, Equality, and Principles of Non-discrimination are the ethos upon which constitutional principles and human rights are founded. The documents such as Constitution, International Covenant on Civil and Political Rights, 1966, (ICCPR) as well as the International Covenant on Economic, Social and Cultural Rights, 1966, (ICESCR), Universal Declaration on Human Rights, 1948 (UDHR) are not mere documents but were created to help the citizens to live a fulfilling life. These principles are truly tested in a time when there is a crisis, the pandemic COVID-19 brought out the best of humankind, but such cruel acts of discrimination and marginalisation will always be remembered even after the pandemic is over, unfair and discriminatory treatment, even to a handful, cannot be condoned as it shakes the foundation upon which the humankind rests. People remember their experience in a difficult time, while some would look back as better air quality, time spent with family, and being locked inside their homes and some would look back as the time when they were stranded in the street, with nowhere to go, nothing to make them feel remotely comfortable. Unbeknownst to humankind, as discriminations in various forms continue, the concept of social distancing slowly inches towards discrimination and at one point the line between them obliterates.

4. Role of *Lathi* in the Pandemic

"Responsibility works for hand in hand with capacity and power", quoted by Sir. J G HOLLAND, which means when a particular authority has been given a phenomenal responsibility it shall not only perform to its utmost capacity but also keep in mind that it does not abuse its conferred powers. The police force in any system of governance has such great responsibility for maintenance of law and order. Model Police Act, 2006 states that the responsibility of Indian Police personnel involves the quality of being accessible, interactive and dynamic[xlviii]. Police personnel has to play multiple roles of helper, saviour, friend and also referee[xlix]. It is one of the most demanding jobs, physically and mentally.

With the outbreak of the pandemic COVID-19 and subsequent measure of lockdown brought forth a new nationwide challenge before the police personnel, to ensure social distancing all across India. While the individuals are obligated to stay indoors, here are these individuals who have to ensure that there the population of over one billion are not on the street without pressing need and remain safe while they do that. Undoubtedly this is a daunting task, as India is comprised of the extremely diverse population.

Police personnel, armed with powers vested upon them by virtue of legislation such as **The Epidemic Diseases Act, 1897,** *the* **Disaster Management Act, 2005** and the **Indian Penal Code, 1860**[l] **started patrolling to ensure social distancing and**

flatten the curve. The legislations entailed a responsibility of maintaining the social distancing through penal provisions, The Disaster Management Act,2005, provides that if a person leaves his home premise for non-essential work and without any reasonable cause, obstruct the work of an officer and does not comply with his direction is liable to impose with fine and/or imprisonment for up to 1 year. Furthermore, the violator can **be under section 188 of Indian Penal Code, 1860 disobedience of order promulgated by a public servant. It is still blurred, on how and why the police personnel felt that it is legally justified to use force and use of *lathi or* baton on the citizens for coming out of their house and violating the lockdown. Several incidents are reported and circulated over social media in the form of a photo, video, audio, text etc. showing** use corporal forces like *lathis* and batons to enforce the law. **It was reported that on 26.03.2020, that an individual named** Sonu Shah, an essential service provider, driving a pickup truck driver ferrying potatoes in Patna, Bihar refused police personnel to bribe, and was shot at his foot[li]. Incidents showing sanitization of *lathi* as "full *tayari*" for ensuring lockdown[lii], numerous other videos police personnel beating and schooling are being circulated, it was also seen that the bystanders who engaged in shooting such incidents found these events funny or righteous, a large section of the society who were not victims of such brutal acts and corporal punishment felt these measures being a justified action. These form corporal measures are

undertaken by the police personnel to ensure social distancing has no legitimacy or legal justification. The most unfortunate element in this act is people treating the event as 'normal', in a civilised society, such acts of violence from state machinery can never be considered as normal. "Normalisation" such behaviour will only be regressive in term of human rights and constitutional principles. The easiest method to make people stay behind closed doors may be such violent and aggressive measures but they are far from the ethos of human rights and constitutional values. *Lathi*-charge, sit-ups, etc. employed by the police personnel, leads to both physical and mental agony and injures individual's dignity too which forms part of Article 21 of the Constitution[liii]. It is rather unfortunate that Indian police personnel still resort to measures from the colonial era to school citizens, with complete disregard for provisions of constitutional rights. When it comes to police brutality during COVID-19, it could be seen from the reported incidents that the victims are from the lower socio-economic segment, the migrant who has embarked upon a journey towards their hometown. It was reported that in Bareilly, Uttar Pradesh, the officials were asked to sanitize the buses, whereas they out of "over-enthusiasm" made the frustrated migrant workers sit on the road with their eyes closed, while they were bathed with disinfectant and sodium hydrochloride or bleach[liv].

Owing to these incidents reflecting abuse of power a plea was filed before Hon'ble Madras High Court, seeking directions to be issued to the police

personnel for refraining from violation of human rights and fundamental rights, while trying to help the nation to flatten the curve[lv]. The Hon'ble High Court issued a notice to the please and stated that a sympathetic, balanced and humane approach must be adopted by the Police Administration in this fight against the pandemic[lvi]. If India does not address the issue of corporal measures administered by police service without the mandate of law during such a crisis, then the whole basis of human rights and constitutional principles must be questioned.

5. Conclusion

Humankind collectively is the victim of COVID-19. The global pandemic has brought questions upon science, technology, medical infrastructure, economy, international law, international relations, and human life amongst others. These questions are yet to be resolved -- brilliant minds in the fields of health, politics, sanitation, police, media, etc. are all relentlessly working to save humankind.

In the midst of all of this, the most essential factor is the information. The circulation of questionable information is a greater threat to humankind than the virus itself. The information system has the power to create the right knowledge to make humankind progress. However, the process of information dissemination is substantially vitiated due to questionable content, and the same needs to be addressed collectively. To successfully address the pandemic, the humankind needs to have genuine information system without offline and online misinformation and address the issue through

ARMT model and essentially customize awareness content created by keeping the target audience in mind; else no show of solidarity can be truly realised. Furthermore, a diverse country like India finally came united against the COVID-19, and was a ray of hope, for brighter future and the possibility of truly united India irrespective of the diversity and differences, or it appeared so. The reaction towards Tablighi jamaat incident, discrimination against people from the northeast part of India and apathy towards the migrants, and the police behaviour showed that the solidarity India exhibited at the initial stage of the fight-back is not absolute, rather on occasion have been violative of human rights and constitutional principles. A victory which involves marginalisation, discrimination, abuse and humiliation of a country's citizen in the hands of their fellow citizens, would leave an indelible mark that will decades to erase.

Souvik Mukherjee is a Research Associate at CRSGPP & Research Scholar, West Bengal National University of Juridical Sciences, Kolkata.

Abhra Jena is a 5th Year Student, Amity Law School, Kolkata

Vikramjit Mullick is a 5th Year Student, Amity Law School, Kolkata.

[i] History and Recent Advances in Coronavirus Discovery Jeffrey S. Kahn, MD, PhD,* and Kenneth McIntosh, MD†

[ii] 'Internet usage in India'<https://www.statista.com/topics/2157/internet-usage-in-india/>accessed 16 April 2020

[iii] 'India - social media users 2023'<https://www.statista.com/statistics/278407/number-of-social-network-users-in-india/> accessed 16 April 2020

[iv]Steven Stalinsky, ' What Jihadists Are Saying About the Coronavirus' (April 5, 2020) <https://www.wsj.com/articles/what-jihadists-are-saying-about-the-coronavirus-11586112043> accessed 16 April 2020

[v]Lisa Singha, Shweta Bansala, Leticia Bodea, CerenBudakb, Guangqing Chic, KornraphopKawintiranona, Colton Paddena, Rebecca Vanarsdalla, Emily Vragad, YanchenWanga, 'e.g. Administrative Law' (01 April 2020) < https://arxiv.org/pdf/2003.13907.pdf> accessed 16 April 2020

[vi]UrviMalvania, ' Coronavirus outbreak: Awareness advertisements flood TV screens' (19 March 2020) < https://brandequity.economictimes.indiatimes.com/news/advertising/coronavirus-outbreak-awareness-advertisements-flood-tv-screens/74665815> accessed 16 April 2020

[vii]' Radio channels come together to bring COVID-19 stories, have banter on Twitter' (13 April 2020) < https://www.livemint.com/news/india/radio-channels-come-together-to-bring-covid-19-stories-have-banter-on-twitter-11586772844751.html> accessed 16 April 2020

[viii] ' Help us Help You' < https://www.mohfw.gov.in/pdf/ProtectivemeasuresHin.pdf; https://www.mohfw.gov.in/pdf/ProtectivemeasuresEng.pdf> accessed 16 April 2020

[ix]Dr. Ravindra Khaiwal; Dr. Suman Mor, ' Kids, Vaayu and Corona 2: Can We Defeat Pandemic'< https://www.mohfw.gov.in/pdf/CoronaComic2PGIPU22Mar20.pdf> accessed 16 April 2020

[x]Ministry of Health and Family Welfare, Government of India, ' How to communicate with COVID-19 suspected or confirmed cases? < https://www.mohfw.gov.in/pdf/LeafletGHFandDHGA.pdf> accessed 16 April 2020

[xi] ' Coronavirus AV Products' ( )<https://drive.google.com/drive/folders/1wvEmLyv3w3gUMpJP5VhgZgXruuusRpJS> accessed 16 April 2020

[xii]' Coronavirus: FIR against 66,000 people for violating lockdown, informs Delhi Police PRO' (04 April 2020) <https://economictimes.indiatimes.com/news/politics-and-nation/coronavirus-fir-against-66000-people-for-violating-lockdown-informs-delhi-police-pro/videoshow/74987912.cms?from=mdr> accessed 17 April 2020

[xiii]Mirror Now Digital, ' Another Tablighi Jamaat shocker! Attendees object to COVID-19 testing; put hospital staff at risk'https://www.timesnownews.com/mirror-now/in-focus/article/another-tablighi-jamaat-shocker-attendees-object-against-testing-put-hospital-staff-at-risk/572880> accessed 17 April 2020

[xiv]Shemin Joy, '\'Send us back home\': Stranded migrant workers in Delhi' (28 March 2020/) < https://www.deccanherald.com/national/send-us-back-home-stranded-migrant-workers-in-delhi-818656.html> accessed 17 April 2020

[xv]Lisa Singha, Shweta Bansala, Leticia Bodea, CerenBudakb, Guangqing Chic, KornraphopKawintiranona, Colton Paddena, Rebecca Vanarsdalla, Emily Vragad, YanchenWanga, 'e.g.

Administrative Law' (01 April 2020) < https://arxiv.org/pdf/2003.13907.pdf> accessed 17 April 2020

[xvi]' Hydroxychloroquine: how an unproven drug became Trump's coronavirus \'miracle cure\'' https://www.theguardian.com/world/2020/apr/06/hydroxychloroquine-trump-coronavirus-drug> accessed 17 April 2020

[xvii]CHRISTIAN PAZ APRIL 9, 2020, 'All the President's Lies About the Coronavirus An unfinished compendium of Trump's overwhelming dishonesty during a national emergency' (09 April 2020) accessed 17 April 2020

[xviii]Abhay Kumar, 'Bihar man beaten to death for informing about COVID-19 suspects' (31 March 2020) < https://www.deccanherald.com/national/east-and-northeast/bihar-man-beaten-to-death-for-informing-about-covid-19-suspects-819595.html> accessed 17 April 2020

[xix]Business Standard, 'Letter to BS: Religious discrimination of workers amid pandemic is inhuman' (16 April 2020) < https://www.business-standard.com/article/opinion/letter-to-bs-religious-discrimination-of-workers-amid-pandemic-is-inhuman-120041600026_1.html> accessed 17 April 2020

[xx] Misinformation, Distrust May Contribute to Black Americans\' COVID-19 Deaths' (10 April 2020) < https://www.npr.org/2020/04/10/831480462/misinformation-distrust-may-contribute-to-black-americans-covid-19-deaths> accessed 17 April 2020

[xxi]Julie Posetti, Cherilyn Ireton, Claire Wardle, Hossein Derakhshan, Alice Matthews, Magda Abu-Fadil, Tom Trewinnard, Fergus Bell, AlexiosMantzarlis, ' Journalism, \'Fake News\' & Disinformation' (2018) < https://en.unesco.org/sites/default/files/journalism_fake_news_disinformation_print_friendly_0.pdf> accessed 17 April 2020

[xxii] 'Man shot in leg, another arrested for violating lockdown in Karnataka' (26 April 2020) < https://bangaloremirror.indiatimes.com/bangalore/others/man-shot-in-leg-another-arrested-for-violating-lockdown-in-karnataka/articleshow/74821973.cms> accessed 17 April 2020
' Coronavirus lockdown in India: 'Beaten and abused for doing my job'' (28 March 2020) < https://www.bbc.com/news/world-asia-india-52063286> accessed 17 April 2020

[xxiii]UP migrant workers given 'chemical bath' in \'disinfection\' exercise' (30 March 2020) < https://www.newindianexpress.com/nation/2020/mar/30/watch-disinfectant-chemical-sprayed-on-migrants-on-return-to-ups-bareilly-2123448.html> accessed 17 April 2020

[xxiv]SIMRIN SIRUR, ' Beaten, abused, spat on': People from Northeast endure racist slurs amid coronavirus panic' (25 March 2020) < https://theprint.in/india/beaten-abused-spat-on-people-from-northeast-endure-racist-slurs-amid-coronavirus-panic/387716/> accessed 17 April 2020

[xxv]https://pib.gov.in/factcheck.aspx

[xxvi]' How is Facebook addressing false news through third-party fact-checkers?' (2020) < https://www.facebook.com/help/1952307158131536> accessed 17 April 2020

[xxvii]Jon Roozenbeek& Sander van der Linden, 'Fake news game confers psychological resistance against online

misinformation' (25 June 2019) < https://www.nature.com/articles/s41599-019-0279-9> accessed 17 April 2020

xxviiiIbid

xxixZoe Kleinman, ' Fake news \'travels faster\', study finds' (09 March 2018) < https://www.bbc.com/news/technology-43344256> accessed 17 April 2020

xxxKarishma Nandkeolyar, ' COVID-19: India lights candles in a show of solidarity against coronavirus' (05 April 2020) accessed 17 April 2020

xxxi' Coronavirus: Indians bang pots and pans to support fight' (22 March 2020) < https://www.bbc.com/news/av/world-asia-india-51997699/coronavirus-indians-bang-pots-and-pans-to-support-fight> accessed 17 April 2020

xxxiiAhmedabad Mirror, 'Sick-ular in times of corona' (02 April 2020) < https://ahmedabadmirror.indiatimes.com/ahmedabad/cover-story/sick-ular-in-times-of-corona/articleshow/74939907.cms> accessed 17 April 2020

xxxiiiDeepshikha Ghosh, 'What Social Distancing? HD Kumaraswamy\'s Son\'s Wedding Draws Scrutiny' (17 April 2020) < https://www.ndtv.com/karnataka-news/nikhil-kumaraswamy-wedding-mega-kumaraswamy-wedding-day-in-karnataka-amid-covid-19-scrutiny-warning-2213255> accessed 17 April 2020;
Nagarjun Dwarakanath , ' Aiyo! BS Yediyurappa ignores own coronavirus advice, attends wedding with 2,000 guests' (16 March 2020) https://www.indiatoday.in/india/story/coronavirus-bs-yediyurappa-attends-wedding-with-2000-guests-1656041-2020-03-16> accessed 17 April 2020

xxxivPress Trust of India, ' UP Man Throws Party For Son\'s Birthday Amid Lockdown, Case Filed' (16 April 2020) < https://www.ndtv.com/india-news/man-throws-party-for-sons-birthday-amid-lockdown-in-ups-gorakhpur-case-filed-2213107> accessed 18 April 2020

xxxvBILLY PERRIGO, ' It Was Already Dangerous to Be Muslim in India. Then Came the Coronavirus' (03 April 2020) < https://time.com/5815264/coronavirus-india-islamophobia-coronajihad/> accessed 18 April 2020

xxxviAhmedabad Mirror, 'Sick-ular in times of corona' (02 April 2020) < https://ahmedabadmirror.indiatimes.com/ahmedabad/cover-story/sick-ular-in-times-of-corona/articleshow/74939907.cms> accessed 17 April 2020

xxxvii' Coronavirus conspiracy theories targeting Muslims spread in India' (2020) < https://www.theguardian.com/world/2020/apr/13/coronavirus-conspiracy-theories-targeting-muslims-spread-in-india> accessed 18 April 2020

xxxviiiJeffrey Gettleman, Kai Schultz and Suhasini Raj, ' In India, Coronavirus Fans Religious Hatred' (12 April 2020) < https://www.nytimes.com/2020/04/12/world/asia/india-coronavirus-muslims-bigotry.html> accessed 18 April 2020

xxxixPriyali Sur, CNN, ' Under India\'s caste system, Dalits are considered untouchable. The coronavirus is intensifying that slur' (16 April 2020) <

https://edition.cnn.com/2020/04/15/asia/india-coronavirus-lower-castes-hnk-intl/index.html> accessed 18 April 2020

xlKIMI COLNEY, ' Indians from the northeast face intensified racism as coronavirus fears grow' (e.g. 03 April 2020) < https://caravanmagazine.in/communities/coronavirus-increases-racism-against-indians-from-northeast> accessed 18 April 2020

xliIndia Today Web Desk, ' Verbally abused, spat at, harassed: Northeastern citizens come under attack amid coronavirus panic' (23 March 2020) < https://www.indiatoday.in/india/story/verbally-abused-spat-at-harassed-northeastern-citizens-come-under-attack-amid-coronavirus-panic-1658826-2020-03-23> accessed 18 April 2020

xliiRAVI AGRAWAL, ' India's Lockdown Helps Its Rich but Ignores Its Poor' (31 March 2020)) < https://foreignpolicy.com/2020/03/31/india-lockdown-helps-rich-ignores-poor-coronavirus-public-health/> accessed 18 April 2020

xliii' Coronavirus lockdown in India: Crowd of migrant workers chased out of Mumbai station' (2020) < https://www.dw.com/en/coronavirus-lockdown-in-india-crowd-of-migrant-workers-chased-out-of-mumbai-station/a-53127613> accessed 18 April 2020

xlivManaviKapur, ' Lockdown is only the beginning of misery for India's migrant labourers' (07 April 2020) < https://qz.com/india/1833814/coronavirus-lockdown-hits-india-migrant-workers-pay-food-supply/> accessed 18 April 2020;
' India\\\'s poorest \\\'fear hunger may kill us before coronavirus\\' (25 March 2020) < India\'s poorest \'fear hunger may kill us before coronavirus\'> accessed 18 April 2020

xlvManaviKapur, ' Lockdown is only the beginning of misery for India's migrant labourers' (07 April 2020) < https://qz.com/india/1833814/coronavirus-lockdown-hits-india-migrant-workers-pay-food-supply/> accessed 18 April 2020;
' India\\\'s poorest \\\'fear hunger may kill us before coronavirus\\' (25 March 2020) < India\'s poorest \'fear hunger may kill us before coronavirus\'> accessed 18 April 2020

xlviSANDHYA RAMESH and MOHANA BASU, ' R0 data shows India's coronavirus infection rate has slowed, gives lockdown a thumbs up' (14 April 2020) < https://theprint.in/science/r0-data-shows-indias-coronavirus-infection-rate-has-slowed-gives-lockdown-a-thumbs-up/399734/> accessed 18 April 2020

xlviiSubir Roy, ' Appalling apathy towards migrant workers' (02 April 2020) < https://www.thehindubusinessline.com/opinion/columns/appalling-apathy-towards-migrant-workers/article31229582.ece> accessed 18 April 2020

xlviiihttps://shodhganga.inflibnet.ac.in/bitstream/10603/21078/10/11_chapter%202.pdf

xlix Ibid

lJehosh Paul, ' An explainer on the legal sanctions governing police actions during the Coronavirus lockdown' (28 March

2020/) < https://www.barandbench.com/columns/an-explainer-on-the-legal-sanctions-governing-police-actions-during-the-battle-against-covid-19> accessed 17 April 2020

[li]Anisha Sircar, ' India's coronavirus lockdown is bringing out the worst in its police force' (28 March 2020/) < https://qz.com/india/1826387/indias-coronavirus-lockdown-brings-police-brutality-to-the-fore/> accessed 18 April 2020

[lii]Trends Desk, ' Video of cops sanitising lathis to school people flouting lockdown goes viral' (25 March 2020) < https://indianexpress.com/article/trending/trending-in-india/video-of-cops-sanitising-lathis-to-school-people-flouting-lockdown-goes-viral-6329853/> accessed 18 April 2020

[liii]Radhika Roy, 'No justification for police brutality against persons during lockdown' (27 March 2020) < https://www.livelaw.in/columns/no-justification-for-police-brutality-against-persons-during-lockdown-154389> accessed 18 April 2020

[liv]Vatsala Gaur, ' UP out comes under sharp attack after video of migrant workers being sprayed with disinfectant goes viral' (30 March 2020) < https://economictimes.indiatimes.com/news/politics-and-nation/up-govt-comes-under-sharp-attack-after-video-of-migrant-workers-being-sprayed-with-disinfectant-goes-viral/articleshow/74897189.cms?utm_source=contentofinterest&utm_medium=text&utm_campaign=cppst> accessed 18 April 2020

[lv]Mohamed Ghouse v The Principal Secretary to the Government, TN and ors; ML Ravi v. Chief Secretary, Govt of Tamil Nadu and ors.

[lvi]Meera Emmanual, 'PIL for guidelines to ensure that Police do not infringe human rights during COVID-19 Lockdown: Madras HC issues notice.'<https://www.barandbench.com/news/litigation/pil-for-guidelines-to-ensure-that-police-do-not-infringe-human-rights-during-covid-19-lockdown-madras-hc-issues-notice> accessed on 18 April 2020