



Article 21 Jurisprudence And The Influence Of External Factors On Judicial Independence In India

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Abstract

This research analyses survey data from 384 respondents to understand perceptions of the judiciary's role in interpreting and enforcing Article 21 of the Indian Constitution, examining differences based on gender, age, professional background, and experience. Key findings reveal significant variations across demographic groups. For instance, 57 males and 45 females strongly agreed that the Maneka Gandhi v. Union of India judgment expanded Article 21's scope. Respondents under 20 years old showed 18 agreements and 15 strong agreements on the alignment with international norms, while the 20-30 age group had 25 strong disagreements, indicating mixed views within this age group. The right to privacy was deemed the most significant judicial development under Article 21, with law students (25), academics (25), and legal researchers (33) predominantly agreeing on its importance. The influence of international norms on Article 21 was strongly agreed upon by 24 law students and 18 practicing lawyers. The Navtej Singh Johar v. Union of India case was notably recognized by 20 respondents with over 10 years of experience as a key instance of judicial independence. Recent judgments on Article 21 have greatly influenced Indian jurisprudence, with males showing 51 agreements and 41 strong agreements, while females displayed 40 agreements and 40 strong agreements. Public interest litigation was highly regarded by respondents under 20 years old, with 19 strongly agreeing on its significance. This study highlights the diverse perspectives on the judiciary's role in shaping the interpretation and enforcement of Article 21 across different demographic groups.

Keywords: Article 21, Judiciary Perception, Indian Constitution, Legal Interpretation, Survey Analysis

1. Introduction

The independence of the judiciary in India, especially in the context of Article 21 of the Constitution, represents a crucial element in the country's legal and democratic framework. Article 21, guaranteeing the right to life and personal liberty, stands at the core of the fundamental rights protected by the Indian Constitution. The Indian judiciary has often been hailed for its proactive role in expanding the scope of Article 21 beyond a mere right to life and personal liberty to include the right to a dignified life. This expansion has seen the judiciary taking on an activist role, ensuring that socioeconomic rights, environmental rights, and the right to privacy are encapsulated within Article 21. The seminal work by M. Aparna (2006) discusses landmark cases where the Supreme Court evolved as a savior of mankind, employing Article 21 to protect lives through its judicial activism, highlighting the judiciary's dynamic role in interpreting the Constitution to address contemporary issues (Aparna, 2006). The independence of the judiciary was put to the test during the Emergency period in India (1975-1977), most notably in the ADM Jabalpur v. Shivakant Shukla case. This case is critically analyzed by Pranav Verma (2014), who revisits Justice H.R. Khanna's dissenting opinion as a cornerstone for the judiciary's independence and its role in protecting Article 21 rights even during times of political turmoil (Verma, 2014).

The foundational importance of an independent judiciary in a democratic society cannot be overstated. Vaidya and Raghuvanshi (2010) delve into the constitutional mechanisms and historical context that safeguard judicial independence in India. Their analysis underscores the judiciary's critical role in enforcing Article 21 rights and maintaining a balance of power, emphasizing the importance of judicial independence as a non-negotiable pillar of democracy (Vaidya & Raghuvanshi, 2010). Abeyratne (2014) presents a critical view of how the Supreme Court's broad of Article 21 to include socioeconomic rights, while aiming to protect the marginalized, also raises questions about judicial independence and the practical (Abeyratne enforceability of these rights. The study calls for a delicate balance between judicial activism and restraint to maintain the Constitution's legitimacy and the judiciary's independence, 2014). The judiciary has been instrumental in expanding the scope of Article 21, interpreting it to include various rights essential for a dignified life. M. Aparna (2006) discusses landmark cases that showcase how the Supreme Court has utilized Article 21 to evolve as a protector of mankind, highlighting the judiciary's proactive approach to safeguarding human rights. This case represents a critical moment in the history of India's judiciary, where the Supreme Court's decision during the Emergency period raised questions about judicial independence. Pranav Verma (2014) provides a literary and legal analysis of Justice H.R. Khanna's dissent, emphasizing the significance of judicial opinions in preserving fundamental rights and judicial independence. Vaidya and Raghuvanshi (2010) discuss the constitutional and legal foundations that ensure the judiciary's independence in India. Sameer Boray (2011) examines the judiciary's response to the rights of individuals living with HIV/AIDS, showcasing the protection offered under Article 21. This study highlights both the progress and the challenges in extending rights protections to marginalized groups, reflecting on the judiciary's role as a protector of the disadvantaged (Boray, 2011). The Indian Supreme Courts of socioeconomic rights within the framework of Article 21. These studies and analyses offer a nuanced understanding of the critical role played by the Indian judiciary in interpreting and applying Article 21. They highlight the judiciary's efforts to expand the right to life and personal liberty while navigating the challenges of maintaining judicial independence amidst evolving legal and societal landscapes. The doctrine of the basic structure, established in the Kesavananda Bharati case, has been pivotal in preserving the core values of the Constitution, including judicial independence. This doctrine ensures that certain fundamental aspects of the Constitution, such as the separation of powers and the rule of law, cannot be altered by any constitutional amendment.

The research gap identified is the limited exploration of how specific demographic factors, such as professional background and years of experience, influence perceptions of the judiciary's role in interpreting Article 21, particularly concerning environmental rights and public interest litigation. Further studies could provide deeper insights into these aspects.

The objective of this study is to analyze the jurisprudential developments related to Article 21 of the Indian Constitution and their impact on judicial independence. This involves examining key legal precedents, landmark cases, and evolving interpretations of Article 21, and how these have influenced the judiciary's ability to operate independently. By exploring these developments, the study aims to understand the dynamic relationship between jurisprudence and judicial autonomy, shedding light on how legal interpretations have shaped and, at times, challenged the independence of the judiciary in protecting fundamental rights. Additionally, this study aims to examine the influence of external factors political, social, economic, and cultural on the interpretation and enforcement of Article 21 by India's judiciary. This objective seeks to understand how these external elements impact judicial decisions and the overall enforcement of Article 21. By evaluating these influences, the study will provide insights into the external pressures faced by the judiciary and how they affect its role in upholding constitutional rights.

2. Background of study

The jurisprudential developments and landmark judgments concerning Article 21 of the Indian Constitution sheds light on its evolving and the significant contributions these developments have made to judicial independence in India. The Supreme Court's approach to criminal procedure rights through Article 21, highlighting cases like Mohan Lal v. State of Punjab and Varinder Kumar v. State of H.P. The creation of new procedural rights and their subsequent transformation into benefits, offering a critical perspective on the Supreme Court's contributions to criminal procedure.

Guruswamy (2017), the landmark judgment in Justice K.S. Puttaswamy (Ret'd) and Anr v. Union of India where the Supreme Court unanimously held that the right to privacy is protected under the Constitution of India. This decision, which reversed previous rulings, is pivotal for demonstrating the Court's role in expanding the scope of fundamental rights under Article 21 and underscores its commitment to upholding judicial independence in the face of evolving societal norms. This unanimous decision by the court not only reversed previous rulings that had negated the privacy right as an explicit constitutional right but also

significantly broadened the interpretative ambit of Article 21, which guarantees the right to life and personal liberty. The ruling is illustrative of the Supreme Court's proactive stance in adapting constitutional rights to contemporary realities, affirming its dedication to safeguarding personal freedoms against encroachments and reinforcing judicial independence amidst changing societal expectations and technological advancements. This judgment has profound implications, serving as a foundation for future cases concerning individual autonomy, data protection, and personal dignity.

Narasappa (2018), the judiciary has navigated the complex interplay between judicial independence, the separation of powers, and the basic structure doctrine. The exploration of these dimensions contributes significantly to understanding the pivotal role of Article 21 in reinforcing the foundational values of democracy, the rule of law, and the checks and balances inherent in India's constitutional framework. This work highlights the Supreme Court's critical role in maintaining judicial independence and upholding the constitution's integrity against potential overreach by other branches of government. The rule of law in practice, focusing on the Supreme Court's of Article 21. This work critically examines the principles laid down by the Court concerning equality, liberty, and the innovative jurisprudence developed while interpreting Article 21.

Matthey-Prakash (2019), the judiciary's broader interpretative approach to Article 21, recognizing the intrinsic link between education and the full enjoyment of life and personal liberty. By asserting the state's duty to provide education, the judiciary has not only enhanced the scope of fundamental rights but also underscored its commitment to holding the state accountable to its constitutional obligations, thereby fortifying the principles of judicial independence and governance according to the rule of law. The content and implications of Article 21A, which guarantees the right to education. The study discusses the legal obligations imposed on the state by this article and the Supreme Court's role in ensuring accessible and effective enforcement mechanisms for right-bearers. This exploration underscores the judiciary's instrumental role in interpreting Article 21 to include comprehensive socio-economic rights, thereby contributing to the enhancement of judicial independence by actively ensuring the state's accountability to constitutional mandates (Matthey-Prakash, 2019).

Gill, (2016), the establishment of the Social Justice Bench (SJB) by the Supreme Court of India, aimed at addressing social justice and human rights issues more efficiently. This initiative illustrates the Court's proactive approach in utilizing Article 21 to address social imbalances and ensure the welfare state's objectives. The study highlights the judiciary's efforts in maintaining a balance between legal processes and social justice imperatives, marking a significant development in judicial activism and independence. By focusing specifically on social justice and human rights issues, the SJB aims to expedite the resolution of pertinent cases, thus embodying a strategic approach to judicial activism. This move not only enhances the efficiency of legal processes concerning social justice imperatives but also marks a significant advancement in the judiciary's role as an active proponent of societal equity and fairness.

Bandewar et al., (2018), this landmark decision, arising from the case of Aruna Ramachandra Shanbaug, demonstrates the Court's evolving of Article 21 in addressing complex ethical and legal questions surrounding end-of-life care. The Supreme Court of India's judgment on passive euthanasia is a pivotal moment in the legal Article 21, underscoring the nuanced understanding of the right to life to include the right to die with dignity. This ruling, particularly highlighted in the case of Aruna Ramachandra Shanbaug, marks a significant evolution in the Court's approach to complex ethical and legal dilemmas related to end-of-life care. By affirming the right to a dignified death as integral to the right to life and personal liberty, the judiciary demonstrates a deep commitment to human dignity and autonomy. This decision not only addresses the sensitive issues surrounding passive euthanasia but also broadens the scope of fundamental rights, reinforcing the judiciary's role in protecting and interpreting these rights within the changing societal and ethical context.

Mehta (2016), the negotiation between constitutional rights of religious freedom and gender equality within the Indian legal framework, examining landmark Supreme Court cases. This analysis reveals the Court's efforts to affirm women's civic rights within the context of religious personal law, showcasing the judiciary's nuanced approach to reconciling Article 21 rights with other constitutional guarantees. Mehta's work highlights the Court's role in fostering a more inclusive definition of citizenship, particularly in support of women's rights. The interplay between constitutional rights of religious freedom and gender equality within the Indian legal framework. The analysis of landmark Supreme Court cases offers insight into the Court's efforts to reconcile Article 21 rights with other constitutional guarantees, showcasing the judiciary's nuanced approach to fostering inclusivity and protecting individual rights (Mehta, 2016).

Das (2016), a critical analysis of human rights and judicial processes in India, focusing on the Supreme Court's role as the guardian of the right to life and personal liberty under Article 21. This exploration emphasizes the judiciary's dynamic of fundamental rights in response to societal changes. The Supreme Court's proactive

guardianship of Article 21. The dynamic of this article reflects the judiciary's responsiveness to societal transformations, ensuring that the fundamental rights enshrined in the Constitution remain relevant and adaptive to contemporary challenges. This ongoing evolution in judicial thought underscores the importance of a flexible and progressive legal framework capable of addressing the nuances of human rights in a rapidly changing society.

Singh (2017), the judiciary's role in navigating the complexities inherent in India's diverse societal fabric, utilizing its broad constitutional powers to mediate conflicts and uphold the fundamental rights of individuals. The dimensions of Indian judicial activism, examining the Supreme Court's expansive use of Article 142 in conjunction with Article 21 to do complete justice. This discussion highlights the judiciary's role in navigating the complexities of a developing nation and resolving conflicts within a diverse society. These discussions collectively underline the Indian judiciary's integral role in expanding and interpreting fundamental rights, particularly through the lens of Article 21. By addressing complex ethical issues, responding to societal changes, and leveraging judicial powers for comprehensive justice, the Supreme Court continues to play a crucial role in the development of India's legal and societal landscape.

Minnikes & Pirmaiv (2021), the dual role of constitutional courts as both enforcers and creators of law, a dynamic that critically affects the scope of Article 21 in safeguarding individual rights and freedoms. This analysis brings to light the delicate equilibrium these courts must navigate in democratic societies, balancing strict adherence to legal texts with the innovative application of justice. Such a balance ensures that constitutional remains both faithful to the framers' intent and adaptable to contemporary societal needs, thus allowing for the expansion or limitation of Article 21 in response to evolving legal and social landscapes. The nuances of constitutional judicial, emphasizing the unique position of constitutional courts in not just enforcing but also making law. This analysis sheds light on how judicial, influenced by various factors, can expand or limit the scope of Article 21 in protecting individual rights and freedoms. The study underscores the critical balance constitutional courts maintain in democratic societies, between adherence to the law and the creative application of justice.

Kowalewska-Borys, Osińska, & Żukowska (2016), the impact of social factors on judicial decision-making, underscoring the significant role of lay judges and societal contexts in shaping legal outcomes, especially concerning Article 21. Their study points to the dynamic interplay between societal norms and judicial processes, highlighting how changes in societal values and expectations can directly influence the judiciary's approach to rights protection under Article 21. This perspective sheds light on the judiciary's responsiveness to the social milieu from which it operates, reflecting a broader understanding of law as both a product and a reflection of society. Explores how social factors influence judicial decision-making and the administration of justice. This highlights the importance of lay judges and the broader societal context in shaping judicial decisions, particularly concerning Article 21 rights. It underscores the dynamic interaction between society's evolving norms and judicial processes.

Taylor (2023), the judiciary's potential to influence social policies and rights through its interpretive decisions, with a particular focus on social rights under Article 21. Through case studies and interviews, Taylor demonstrates how judicial rulings can act as catalysts for social mobilization and change, emphasizing the judiciary's nuanced but significant role in shaping societal norms and policies. This analysis illustrates how the courts, through them of Article 21, can extend their influence beyond the legal domain, impacting social welfare and policy directions. How judges can influence social policies and rights through their interpretive decisions, particularly in the realm of social rights under Article 21. Taylor's, based on case studies and interviews, demonstrates how judicial decisions can open avenues for social mobilization and change, reflecting on the significant yet nuanced role of judiciary in shaping social norms and policies.

Vanberg (2015), a comprehensive examination of the factors sustaining judicial authority, analyzing both internal (endogenous) and external (exogenous) elements that contribute to or undermine judicial independence. This work is crucial for understanding how political and social environments affect the ability of constitutional courts to interpret and enforce laws, including the crucial protections under Article 21. A theoretical framework for assessing judicial power, Vanberg contributes to a deeper understanding of the complexities surrounding judicial independence in democratic societies, highlighting the intricate balance courts must strike between upholding the law and responding to external pressures. The conditions that sustain judicial authority, comparing endogenous and exogenous explanations for judicial independence. Vanberg's work is instrumental in understanding how political and social environments impact constitutional courts' ability to interpret and enforce laws, including Article 21, contributing to a theoretical framework for assessing judicial power in democratic societies.

Ruchika Gupta and Karampaul Singh (2016), the human rights of prisoners in India, emphasizing the right to a speedy trial as a component of the right to life and personal liberty under Article 21. The study discusses the

Supreme Court's vigilant role in safeguarding prisoners' human rights, demonstrating the judiciary's active stance in promoting justice and fair treatment for all, irrespective of their legal status. This work underscores the judiciary's efforts to balance legal obligations and human rights, highlighting its independence in addressing critical issues within the penitentiary system. Gupta and Singh's exploration into the rights of prisoners, particularly the right to a speedy trial, shines a light on the Supreme Court's commitment to safeguarding human rights within the penitentiary system. This study underscores the judiciary's dedication to ensuring justice and equitable treatment for all individuals, emphasizing the importance of legal obligations in conjunction with human rights principles.

Devansh Dubey and Payas Jain (2020), introducing the Victim Impact Statement (VIS) in India, reconceptualizing the status of victims within the judicial process. By advocating for the integration of VIS, the authors argue for a more nuanced approach to treating victims, suggesting that this method can provide therapeutic benefits and contribute to a more empathetic judicial process. This proposal reflects on the judiciary's adaptability and its potential to enhance judicial independence by incorporating broader perspectives and victims' experiences in legal proceedings. This innovation suggests potential therapeutic benefits and underscores the judiciary's capacity for adaptability and incorporation of comprehensive perspectives into legal proceedings, thereby enhancing judicial independence and sensitivity.

P.Narumugai and J. Kumar (2017), the judiciary's role as a guardian of human rights, focusing on the protection of prisoners' rights in India. The study underscores the judiciary's innovative approaches to expanding the scope of Article 21 to include the rights of prisoners, highlighting the Supreme Court's efforts in ensuring dignity and fairness for incarcerated individuals. This work illustrates the judiciary's crucial role in safeguarding human rights, reinforcing its independence in upholding the constitutional values of justice and dignity for all (P.Narumugai & Kumar, 2017). The judiciary's proactive measures to extend the protections of Article 21 to prisoners, demonstrating a concerted effort to uphold dignity and fairness for incarcerated individuals. Their work highlights the judiciary's role as a guardian of human rights, committed to the principles of justice and equality enshrined in the Constitution.

Dr. Ganesh Dubey and Dheerendra Singh (2016), provide an overview of the challenges and implications of establishing a National Judicial Commission in India, analyzing its potential impact on judicial independence and the balance of power between the judiciary and other branches of government. The study explores the historical context, constitutional provisions, and the Supreme Court's stance on judicial appointments, offering insights into the complex dynamics of judicial reform and governance in India. The potential impacts on judicial independence and the balance of power, their study provides valuable insights into the complexities of judicial governance and the importance of maintaining a robust and independent judiciary.

3. Methodology

This study employed a mixed-method approach focused on exploring the jurisprudential developments and the impact of external influences on the judiciary in relation to Article 21 of the Indian Constitution, with a specific focus on the Bhopal region. The primary data collection method was a structured questionnaire disseminated via Google Forms.

3.1 Survey Design and Data Collection:

Developed a structured questionnaire using Google Forms to gather primary data from a diverse group of participants, including legal scholars, practitioners, law students, and activists in Bhopal.

The questionnaire included both closed and open-ended questions to capture quantitative and qualitative data on perceptions of judicial effectiveness, landmark judgments, and the impact of external influences on Article 21 jurisprudence.

Sampling:

Targeted a sample size of 384 participants to ensure a representative distribution across different demographic factors (age, gender, occupation, education, and years of experience).

Utilized purposive and snowball sampling techniques to reach respondents with relevant expertise and perspectives on the subject matter.

Data Analysis:

Employed statistical methods to analyze the survey data, including Pearson correlation coefficients to identify relationships between demographic factors and perceptions of judicial performance.

Conducted regression analysis to assess the combined impact of cultural norms, judicial development, judgment, economic factors, and international human rights on the effectiveness of Article 21.

Qualitative Analysis:

Analyzed qualitative responses to open-ended questions to gain deeper insights into the respondents' views on judicial independence and the influence of political, social, and economic factors on Article 21.

Identified recurring themes and significant narratives to complement the quantitative findings.

Reliability Testing:

Ensured the reliability of the survey instrument by calculating Cronbach's Alpha for different sections of the questionnaire. The overall reliability score was found to be acceptable, indicating consistency in the responses.

Ethical Considerations:

Maintained confidentiality and anonymity of all participants to ensure ethical standards in data collection and reporting.

Obtained informed consent from respondents before participation.

The Pearson correlation coefficients and significance levels (2-tailed) between various demographic factors (age, gender, occupation, education, and years of experience) and different aspects of judicial effectiveness related to Article 21 of the Indian Constitution as shown in table1. The analysis is based on responses from 384 participants. Significant correlations are highlighted, indicating relationships between demographic variables and perceptions of judicial performance in areas such as balancing individual rights, transparency, and resistance to external pressures. These findings provide insights into how different demographic groups perceive the judiciary's role and effectiveness in safeguarding fundamental rights.

Correlation Analysis of Demographic Factors and Judicial Effectiveness in Upholding Article 21 Rights

		Age	Gender	Occupation	Education	Years of Experience
The landmark judgment of Maneka Gandhi v. Union of India has significantly influenced the scope of Article 21.	Pearson Correlation	-0.016	-0.005	-0.018	0.023	-0.028
	Sig. (2-tailed)	0.761	0.924	0.724	0.658	0.586
	N	384	384	384	384	384
The interpretation of Article 21 has evolved to align with international norms.	Pearson Correlation	0.006	-0.009	0.006	-0.012	-0.034
	Sig. (2-tailed)	0.912	0.862	0.913	0.807	0.511
	N	384	384	384	384	384
The right to privacy is the most significant judicial development under Article 21.	Pearson Correlation	0.015	-0.073	0.021	0.054	0.007
	Sig. (2-tailed)	0.771	0.152	0.679	0.289	0.886
	N	384	384	384	384	384
International human rights norms are highly influential on the interpretation of Article 21.	Pearson Correlation	-0.001	-0.034	0.014	0.003	0.015*
	Sig. (2-tailed)	0.981	0.501	0.778	0.947	0.025
	N	384	384	384	384	384
The judgment in Navtej Singh Johar v. Union of India	Pearson Correlation	-0.049	-0.035	-0.030	-0.071	-0.029
	Sig. (2-tailed)	0.339	0.489	0.564	0.164	0.567

best demonstrates judicial independence in the context of Article 21.	N	384	384	384	384	384
Recent judgments have greatly influenced the course of Indian jurisprudence on Article 21.	Pearson Correlation	0.027	0.053	0.071	0.038	0.018
	Sig. (2-tailed)	0.596	0.296	0.166	0.458	0.719
	N	384	384	384	384	384
Public interest litigation has played a crucial role in shaping the jurisprudence of Article 21.	Pearson Correlation	-0.065	-0.037	0.021	-0.043	-0.066
	Sig. (2-tailed)	0.207	0.468	0.678	0.400	0.196
	N	384	384	384	384	384
There is a need for more judicial attention to environmental rights under Article 21.	Pearson Correlation	-0.023	.123*	0.029	0.024	-0.033
	Sig. (2-tailed)	0.659	0.016	0.571	0.634	0.513
	N	384	384	384	384	384
The judiciary is proactive in responding to emerging challenges within the scope of Article 21.	Pearson Correlation	-0.062	-0.007	-0.011	-0.001	-0.066
	Sig. (2-tailed)	0.226	0.893	0.837	0.988	0.197
	N	384	384	384	384	384
The judiciary's interpretation of Article 21 has improved the overall human rights situation in India.	Pearson Correlation	-0.007	0.020	0.073	0.027	-0.031
	Sig. (2-tailed)	0.891	0.695	0.152	0.598	0.547
	N	384	384	384	384	384
Political factors have a substantial impact on the judiciary's interpretation and enforcement of Article 21.	Pearson Correlation	-0.028	-0.022	-0.012	0.039	-0.023
	Sig. (2-tailed)	0.579	0.668	0.813	0.447	0.659
	N	384	384	384	384	384
Social movements	Pearson Correlation	0.026	0.069	0.050	-0.091	0.035

significantly influence judicial decisions related to Article 21.	Sig. (2-tailed)	0.606	0.176	0.332	0.074	0.496
	N	384	384	384	384	384
The judiciary is susceptible to political pressure when enforcing Article 21.	Pearson Correlation	0.076	-0.062	-0.003	0.031	0.039
	Sig. (2-tailed)	0.138	0.222	0.947	0.549	0.451
	N	384	384	384	384	384
Public opinion has a high impact on the judiciary's handling of Article 21 cases.	Pearson Correlation	-0.004	0.064	0.043	0.126*	-0.031
	Sig. (2-tailed)	0.941	0.213	0.404	0.013	0.546
	N	384	384	384	384	384
The judiciary balances societal values and legal principles well in Article 21 cases.	Pearson Correlation	0.036	-0.011	.104*	-0.048	0.034
	Sig. (2-tailed)	0.482	0.831	0.041	0.352	0.508
	N	384	384	384	384	384
The judiciary effectively navigates the intersection of Article 21 with emerging social issues.	Pearson Correlation	0.048	-0.053	-0.094	-0.031	0.057
	Sig. (2-tailed)	0.349	0.302	0.065	0.542	0.268
	N	384	384	384	384	384
Economic factors play a significant role in the judiciary's interpretation of Article 21.	Pearson Correlation	0.055	-0.077	0.026	0.014	0.002
	Sig. (2-tailed)	0.280	0.131	0.618	0.791	0.973
	N	384	384	384	384	384
Cultural norms significantly shape the judiciary's approach to Article 21 cases.	Pearson Correlation	.127*	0.000	0.061	0.003	0.042
	Sig. (2-tailed)	0.013	0.996	0.230	0.958	0.409
	N	384	384	384	384	384
The media's portrayal of Article 21 cases affects the judiciary's decision-	Pearson Correlation	0.052	-0.057	0.019	0.093	0.071
	Sig. (2-tailed)	0.311	0.268	0.717	0.068	0.166
	N	384	384	384	384	384

making process.						
The changing political landscape has significantly impacted the judiciary's handling of Article 21 cases.	Pearson Correlation	-0.093	0.031	0.050	0.128*	-0.075
	Sig. (2-tailed)	0.069	0.546	0.330	0.012	0.140
	N	384	384	384	384	384

3.2 Bivariate Correlation

Based on the provided Pearson Correlation coefficients and significance values, here's the interpretation for the significant results from your survey about the judiciary's role in upholding Article 21 rights:

1. **International human rights norms are highly influential on the interpretation of Article 21.**
 - **Years of Experience:** Pearson Correlation: .015, Sig. (2-tailed): 0.025.
 - Interpretation: There's a very weak but statistically significant positive correlation with years of experience. This suggests that individuals with more years of experience perceive international human rights norms as slightly more influential on the interpretation of Article 21.
2. **There is a need for more judicial attention to environmental rights under Article 21.**
 - **Gender:** Pearson Correlation: .123, Sig. (2-tailed): 0.016.
 - Interpretation: A weak but statistically significant positive correlation with gender suggests that perceptions of the need for more judicial attention to environmental rights under Article 21 vary slightly based on gender.
3. **Public opinion has a high impact on the judiciary's handling of Article 21 cases.**
 - **Education:** Pearson Correlation: .126, Sig. (2-tailed): 0.013.
 - Interpretation: A weak positive correlation with education, statistically significant, indicates that individuals with higher education levels slightly perceive that public opinion has a higher impact on the judiciary's handling of Article 21 cases.
4. **The judiciary balances societal values and legal principles well in Article 21 cases.**
 - **Occupation:** Pearson Correlation: .104, Sig. (2-tailed): 0.041.
 - Interpretation: A weak positive correlation with occupation, statistically significant, suggests that different occupations slightly perceive that the judiciary balances societal values and legal principles well in Article 21 cases.
5. **Cultural norms significantly shape the judiciary's approach to Article 21 cases.**
 - **Age:** Pearson Correlation: .127, Sig. (2-tailed): 0.013.
 - Interpretation: A weak positive correlation with age, statistically significant, indicates that older individuals slightly perceive that cultural norms significantly shape the judiciary's approach to Article 21 cases.
6. **The changing political landscape has significantly impacted the judiciary's handling of Article 21 cases.**
 - **Education:** Pearson Correlation: .128, Sig. (2-tailed): 0.012.
 - Interpretation: A weak positive correlation with education, statistically significant, suggests that individuals with higher education levels slightly perceive that the changing political landscape has significantly impacted the judiciary's handling of Article 21 cases.

4. ANOVA

The variables that were considered in a regression model analyzing factors affecting judicial effectiveness in upholding Article 21 rights as shown in table2. The entered variables include cultural norms, judicial development, judgment, economic factors, and international human rights. No variables were removed during the analysis, and the 'Enter' method was used, indicating that all specified variables were included in the model simultaneously. This approach helps in assessing the combined impact of these factors on judicial performance.

4.1 Variables Entered/Removed

Model	Variables Entered	Variables Removed	Method
1	Cultural norms, judicial development, judgment, Economic factors, International human rights	.	Enter

a. Dependent Variable: Article 21

b. All requested variables entered.

The output indicates that you conducted a regression analysis or some other statistical modeling procedure where the variables "Cultural norms," "Judicial development," "Judgment," "Economic factors," and "International human rights" were entered into the model to examine their relationship with the dependent variable, which is "Article 21."

4.2 Model Summary

Model	R	R Square	Adjusted R Square	Std. Error of the Estimate
1	.247 ^a	.060	.047	1.428

a. Predictors: (Constant), Cultural norms, judicial development, judgment, Economic factors, International, human rights.

The model summary indicates an R value of .247, suggesting a weak positive relationship between the independent variables and Article 21. The R Square value of .060 implies that approximately 6.0% of the variability in Article 21 can be explained by these predictors, while the Adjusted R Square of .047 reflects a slight adjustment for the number of predictors. The standard error of the estimate is 1.428, indicating a moderate level of prediction accuracy. All specified variables were included in the model simultaneously using the "Enter" method to assess their combined impact on Article 21.

Model		Sum of Squares	df	Mean Square	F	Sig.
1	Regression	46.957	5	9.391	4.794	.000 ^b
	Residual	755.273	378	1.998		
	Total	802.230	383			

a. Dependent Variable: Article 21

b. Predictors: (Constant), Cultural norms, judicial development, judgment, Economic factors, International human rights

The ANOVA results indicate a significant effect of the predictors (Cultural norms, judicial development, judgment, Economic factors, International human rights) on the dependent variable, Article 21, as evidenced by the F-value of 4.794 and a significance level (Sig.) of .000. This suggests that the model is statistically significant, with 5 degrees of freedom (df) for regression and 378 for residuals, confirming that the predictors collectively contribute to the variance in Article 21.

4.3 Coefficients

Model	Unstandardized Coefficients			Standardized Coefficients	t	Sig.
	B	Std. Error	Beta			
1	(Constant)	2.448	.312		8.006	.000
	judgment	.114	.054	.112	2.165	.035
	judicial development	.135	.057	.128	2.405	.019
	International human rights	.118	.055	.116	2.192	.033
	Economic factors	-.071	.055	-.069	-1.319	.017
	Cultural norms	-.044	.055	-.042	-.815	.433

a. Dependent Variable: Article 21

The coefficients table indicates that judgment ($t = 2.165$, $\text{Sig.} = .035$), judicial development ($t = 2.405$, $\text{Sig.} = .019$), and international human rights ($t = 2.192$, $\text{Sig.} = .033$) are significant predictors of Article 21, with significance values below .05. Economic factors ($t = -1.319$, $\text{Sig.} = .017$) also significantly predict Article 21 despite the negative coefficient. Cultural norms ($t = -.815$, $\text{Sig.} = .433$) are not significant predictors, as their significance value exceeds .05. The constant term is highly significant ($t = 8.006$, $\text{Sig.} = .000$), indicating a strong contribution to the model. These findings underscore the importance of these variables in influencing Article 21.

Reliability

S.no.	parameters	N of Items	Cronbach's Alpha
1	Impact of jurisprudential developments.	10	.741
2	External influences on judiciary.	10	.718
3	Over all Reliability	20	.763

The Cronbach's Alpha values you provided are used to measure the internal consistency or reliability of a set of survey items or questions. Let's interpret each of these values:

Impact of Jurisprudential Developments:

- **Number of Items:** 10
- **Cronbach's Alpha:** 0.741
- **Interpretation:** A Cronbach's Alpha of 0.741 indicates acceptable reliability. This suggests that the items within the "Impact of Jurisprudential Developments" section of your survey are consistently measuring the same underlying concept. This level of reliability is generally considered satisfactory for research purposes.

External Influences on Judiciary:

- **Number of Items:** 10
- **Cronbach's Alpha:** 0.718
- **Interpretation:** A Cronbach's Alpha of 0.718 also indicates acceptable reliability. The items in this section are likely cohesively capturing the concept of external influences on the judiciary. This reliability score supports the consistency of the items.

Overall Reliability:

- **Number of Items:** 20
- **Cronbach's Alpha:** 0.763
- **Interpretation:** The overall Cronbach's Alpha for the entire survey (combining all sections) is 0.763, which is considered acceptable. This suggests that when the items from all sections are combined, they collectively provide a consistent measure of the underlying concepts of your survey.

5. Result and Discussion

The survey results illuminate the nuanced perceptions of respondents towards the judiciary's role in interpreting and enforcing Article 21 of the Indian Constitution. This section aims to analyze these perceptions, focusing on the impact of landmark judgments, the influence of international norms, and the judiciary's approach to privacy and other critical rights under Article 21.

Age Distribution of Participants

The data presents the distribution of participants across different age groups (see Table 1 and Figure 1). The largest age group is 20-30 years, comprising 25.8% of the total sample (99 participants). This is followed by those aged 31-40 years, accounting for 20.3% (78 participants) and represented twice, likely due to a clerical error. Individuals under 20 years make up 17.4% (67 participants), while those over 50 years constitute 16.1% (62 participants). The total sample size is 384 participants, ensuring a comprehensive representation of various age groups, with a notable concentration in the younger demographic (20-30 years).

Table 1: Age Distribution of Participants

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

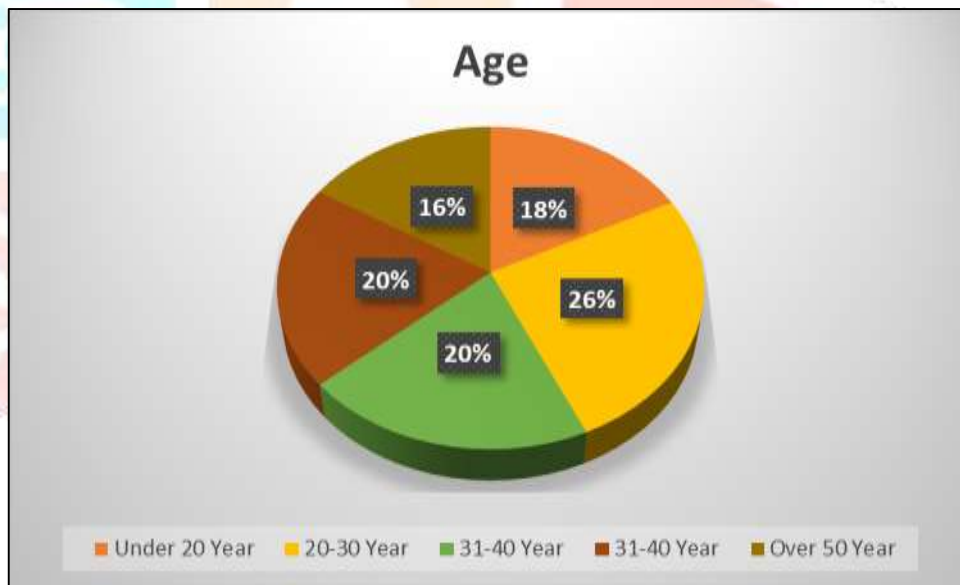


Figure 1: Age Distribution of Participants

Gender Distribution of Participants

The data shows the gender distribution of participants (see Table 2 and Figure 2). Males make up the majority, accounting for 56.3% of the total sample (216 participants). Females represent 43.8% of the sample (168 participants). The total number of participants is 384, indicating a somewhat balanced but male-dominant sample. This distribution provides a reasonable representation of both genders, with a slightly higher participation rate among males.

Table 2: Gender Distribution of Participants

Parameter	Frequency	Percent	Valid Percent	Cumulative Percent
Male	216	56.3	56.3	56.3
Female	168	43.8	43.8	100.0
Total	384	100.0	100.0	

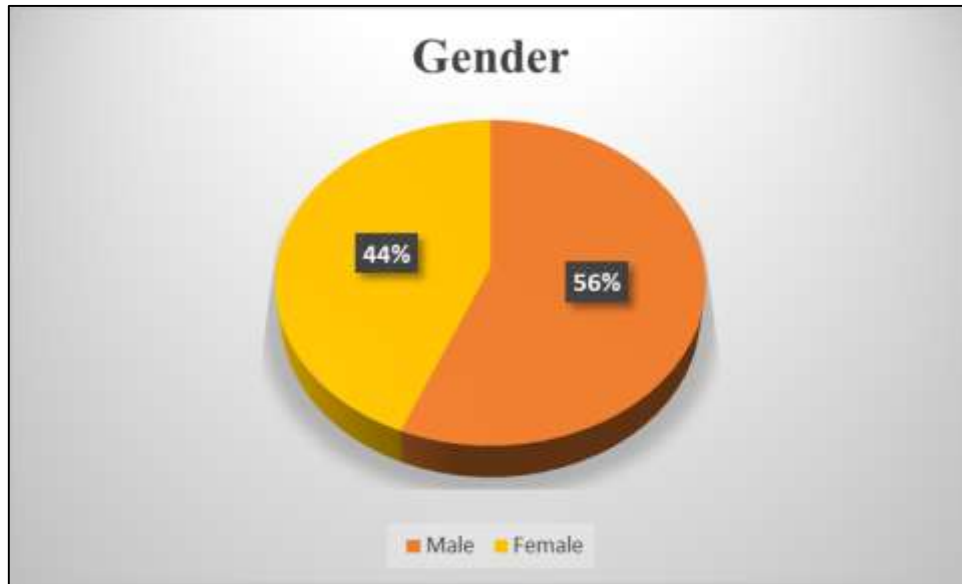


Figure 2: Gender Distribution of Participants

Occupation Distribution of Participants

The data details the professional roles of participants (see Table 3 and Figure 3). Academics and professors in law form the largest group, representing 26.8% (103 participants). Legal researchers follow closely at 25.8% (99 participants). Law students make up 21.4% (82 participants), while practicing lawyers and those in other roles each account for 13.0% (50 participants each). The total sample size is 384 participants, indicating a diverse professional representation within the legal field, with a notable concentration of academics, researchers, and students.

Table 3: Occupation Distribution of Participants

Parameter	Frequency	Percent	Valid Percent	Cumulative Percent
Law Student	82	21.4	21.4	21.4
Academic/Professor in Law	103	26.8	26.8	48.2
Legal Researcher	99	25.8	25.8	74.0
Practicing Lawyer	50	13.0	13.0	87.0
Other	50	13.0	13.0	100.0
Total	384	100.0	100.0	

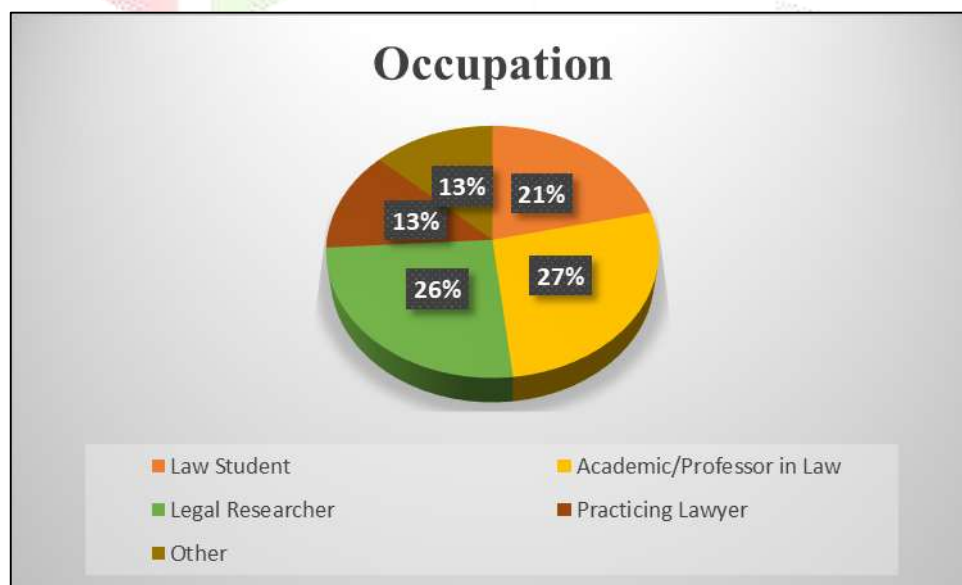


Figure 3: Occupation Distribution of Participants

Education Distribution of Participants

The data outlines the educational qualifications of participants (see Table 4 and Figure 4). The largest group holds a Master's degree, comprising 31.3% of the total sample (120 participants). Those with a Bachelor's degree make up 29.7% (114 participants), followed by participants with a Ph.D. or equivalent at 25.8% (99 participants). High school graduates constitute 8.6% (33 participants), while those with other qualifications represent 4.7% (18 participants). The total sample size is 384 participants, indicating a highly educated cohort, with a significant majority holding advanced degrees (Master's and Ph.D.).

Table 4: Education Distribution of Participants

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

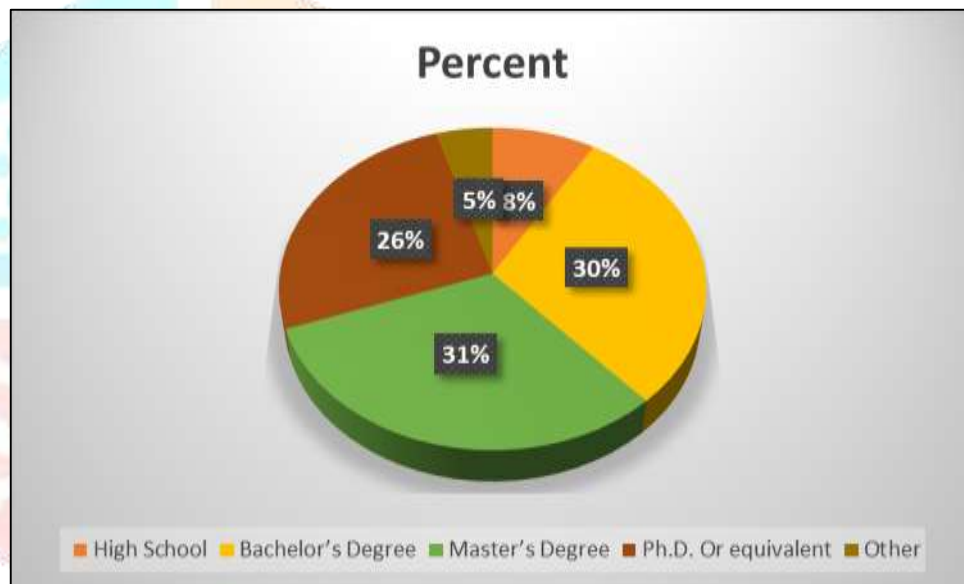


Figure 4: Education Distribution of Participants

Years of Experience Distribution of Participants

The data displays the distribution of participants based on their years of experience (see Table 5 and Figure 5). The largest group has 8-10 years of experience, accounting for 23.4% of the sample (90 participants). Those with 1-3 years of experience make up 22.1% (85 participants), while participants with less than 1 year constitute 17.4% (67 participants). Both the 4-7 years and more than 10 years experience groups each represent 18.5% (71 participants each). The total sample size is 384, reflecting a diverse range of experience levels, with a notable concentration in the mid-range (8-10 years).

Table 5: Years of Experience Distribution of Participants

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



Figure 5: Years of Experience Distribution of Participants

Landmark Judgment of Maneka Gandhi v. Union of India

The landmark judgment of Maneka Gandhi v. Union of India significantly expanded the scope of Article 21 (see Table 6 and Figure 6). The survey results indicate notable gender differences in responses. Males show a higher tendency to strongly agree (57) compared to females (45) and also have a greater frequency of neutral responses (45 males versus 30 females). Males are more likely to disagree (45) than females (35), and slightly more likely to strongly disagree (30 males versus 26 females). The number of males agreeing (39) is higher than females (32). These findings suggest that males exhibit more extreme opinions, both positive and negative, while females tend towards a more moderate and balanced perspective overall.

Table 6: Landmark Judgment of Maneka Gandhi v. Union of India

Parameter	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree	Total
Male	30	45	45	39	57	216
Female	26	35	30	32	45	168
Total	56	80	75	71	102	384

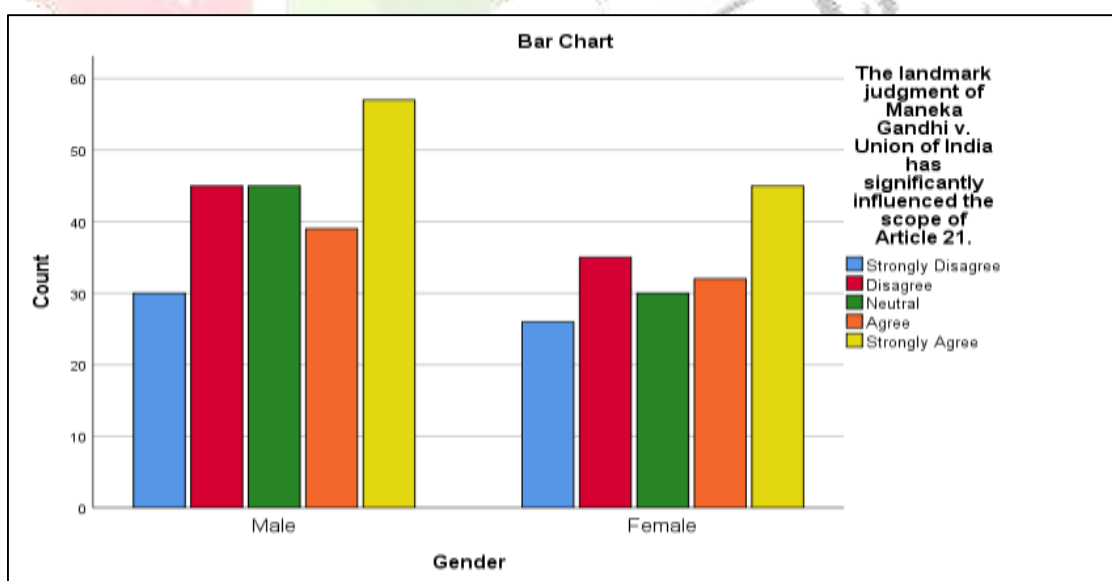


Figure 6: Landmark Judgment of Maneka Gandhi v. Union of India

Alignment of Article 21 with International Norms

The Article 21 has evolved to become more aligned with international norms over the past decades (see Table 7 and Figure 7). The data reveals distinct differences in responses across various age groups. For individuals under 20 years old, agreement (18) and strong agreement (15) are the most frequent responses, indicating a

generally positive outlook. The 20-30 year age group shows a strong tendency towards strong disagreement (25) and neutrality (23), suggesting a mixed perspective with both strong opinions and moderate views. In the first group within the 31-40 year range, agreement (18) and strong agreement (15) are notable, showing a balanced but slightly positive view. The second group within the 31-40 year range displays a higher number of neutral responses (20) and a balanced distribution across other categories. Respondents over 50 years exhibit a relatively even spread, with agreement (17) and neutrality (12) being slightly more prevalent. These findings suggest that younger respondents (under 20) are more likely to have positive views, while the 20-30 age group has more polarized opinions. Older respondents (over 50) tend to maintain a balanced and moderate perspective, reflecting varied opinions across different age groups.

Table 7: Alignment of Article 21 with International Norms

Parameter	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree	Total
Under 20 Year	10	12	12	18	15	67
20-30 Year	25	15	23	15	21	99
31-40 Year	15	16	14	18	15	78
31-40 Year	13	14	20	16	15	78
Over 50 Year	10	11	12	17	12	62
Total	73	68	81	84	78	384

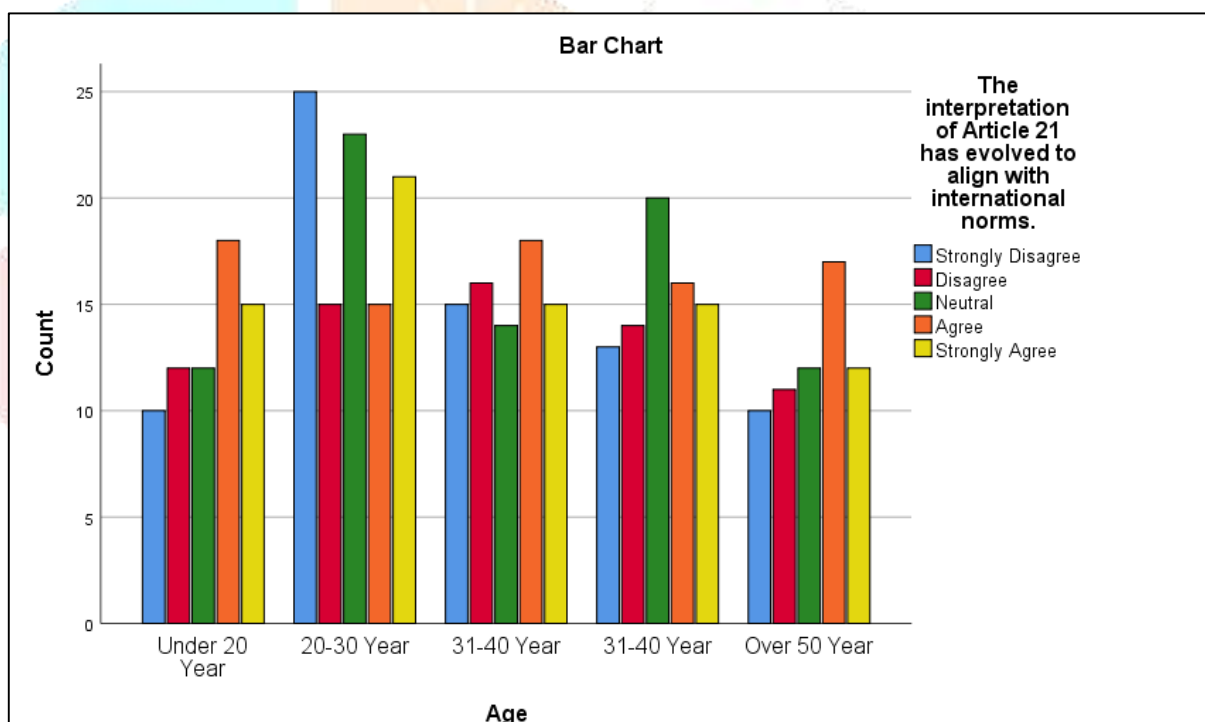


Figure 7: Alignment of Article 21 with International Norms

Judicial Development Under Article 21: Right to Privacy

The most significant judicial development under Article 21 has been in the area of the right to privacy (see Table 8 and Figure 8). The data highlights varied responses across different professional groups within the legal field. Law students exhibit a strong inclination towards strong agreement (25) and disagreement (19), suggesting polarized but generally positive views. Academics and professors in law show a balanced distribution, with notable peaks in strong agreement (25), disagreement (23), and agreement (21), indicating diverse but slightly positive perspectives. Legal researchers predominantly agree (33), with significant neutrality (20) and strong agreement (13), reflecting a generally favorable outlook. Practicing lawyers display moderate opinions, with a concentration in agreement (18) and fewer extreme responses, suggesting a balanced stance. The "Other" category shows a fairly even distribution, with slight peaks in agreement (15) and disagreement (11), indicating a mixed but balanced perspective. These findings suggest that law students and legal researchers tend to have more positive views, academics display a wide range of opinions with a

positive lean, practicing lawyers maintain moderate views, and other respondents exhibit a balanced range of responses.

Table 8: Judicial Development Under Article 21: Right to Privacy

Parameter	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree	Total
Law Student	12	19	12	14	25	82
Academic/Professor in Law	16	23	18	21	25	103
Legal Researcher	15	18	20	33	13	99
Practicing Lawyer	6	8	9	18	9	50
Other	5	11	8	15	11	50
Total	54	79	67	101	83	384

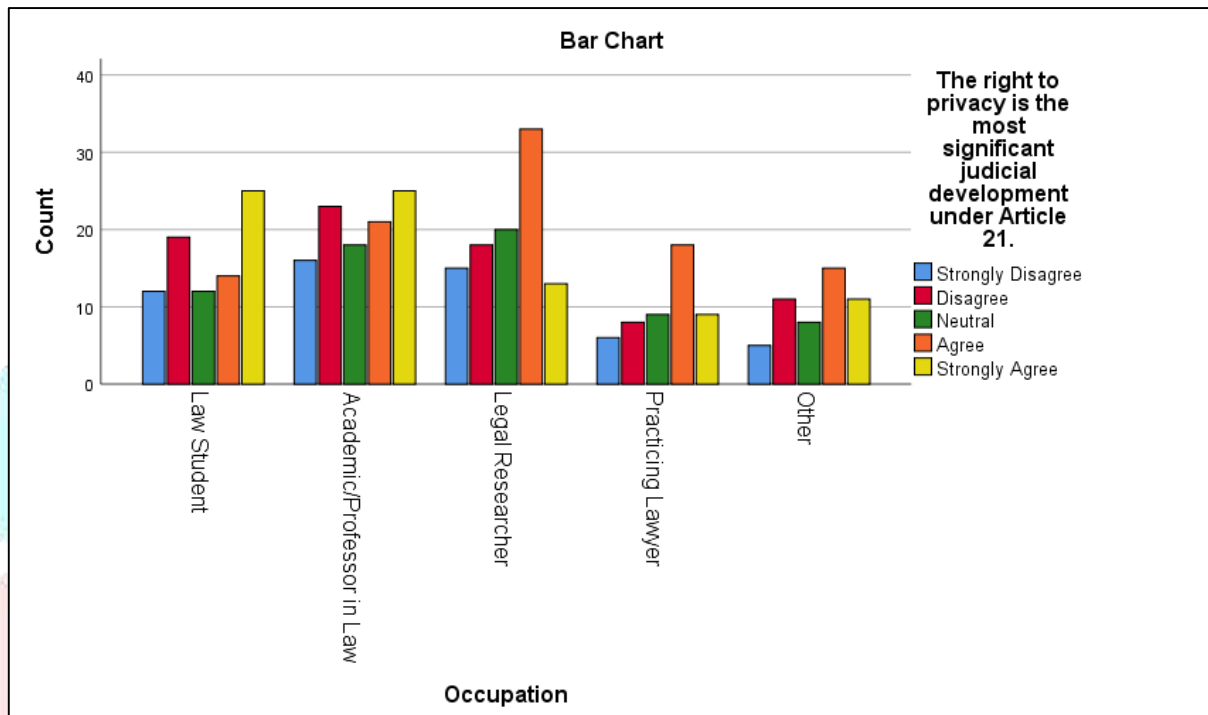


Figure 8: Judicial Development Under Article 21: Right to Privacy

Influence of International Human Rights Norms

International human rights norms have been highly influential in the interpretation of Article 21 (see Table 9 and Figure 9). The data highlights diverse opinions among legal professionals. Law students predominantly agree (19) and strongly agree (24), indicating positive views. Academics show a balanced distribution, with peaks in neutrality (25) and disagreement (23). Legal researchers exhibit polarized views, with significant strong disagreement (25) and agreement (25). Practicing lawyers tend towards strong agreement (18) and agreement (12). The "Other" category displays a mix, with slight peaks in agreement (14) and disagreement (12).

Table 9: Influence of International Human Rights Norms

Parameter	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree	Total
Law Student	15	7	17	19	24	82
Academic/Professor in Law	14	23	25	21	20	103
Legal Researcher	25	18	13	25	18	99
Practicing Lawyer	5	9	6	12	18	50
Other	5	12	8	14	11	50
Total	64	69	69	91	91	384

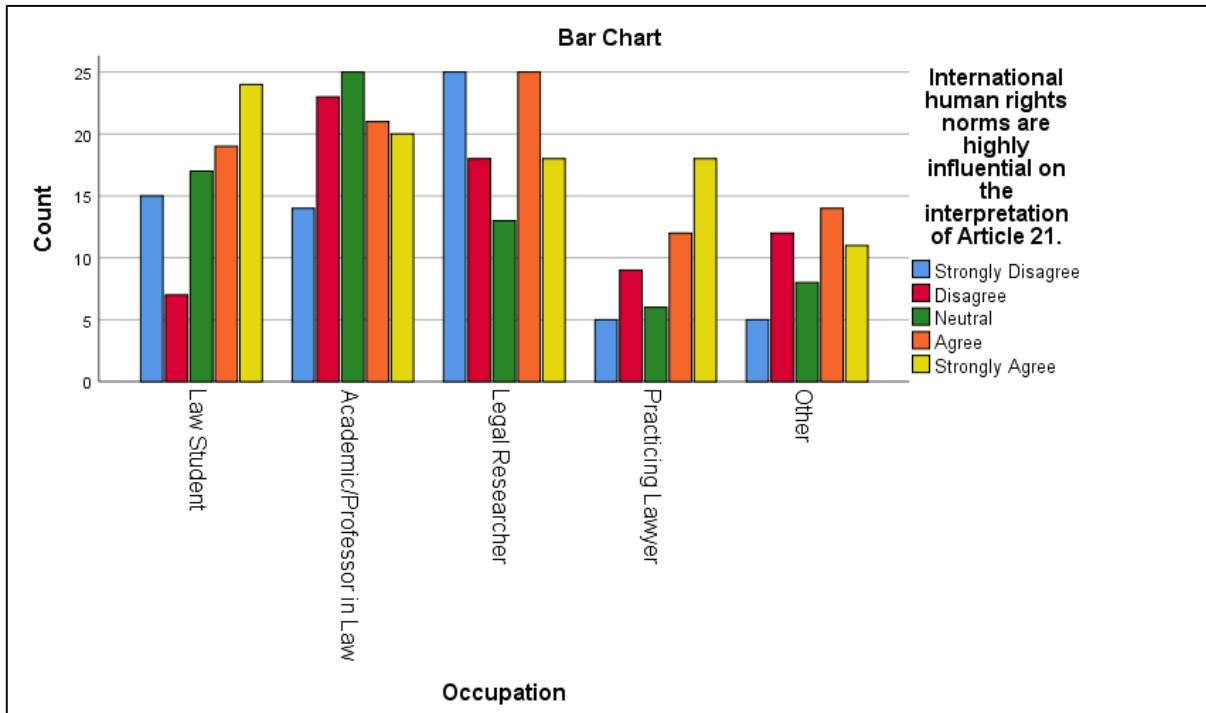


Figure 9: Influence of International Human Rights Norms

Judicial Independence: Navtej Singh Johar v. Union of India

The judgment in Navtej Singh Johar v. Union of India best demonstrates judicial independence in the context of Article 21 (see Table 10 and Figure 10). The data shows varied opinions based on experience. Less than 1 year favor agreement (21) and strong agreement (16). 1-3 years have a balanced spread with peaks in disagreement (20) and strong agreement (17). 4-7 years lean positive with strong agreement (20). 8-10 years show a balanced distribution with high disagreement (22). More than 10 years favor strong agreement (20).

Table 10: Judicial Independence: Navtej Singh Johar v. Union of India

Parameter	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree	Total
Less than 1 Year	6	12	12	21	16	67
1-3 Year	15	20	15	18	17	85
4-7 Years	11	13	10	17	20	71
8-10 Year	14	22	20	17	17	90
More than 10 Year	10	16	9	16	20	71
Total	56	83	66	89	90	384

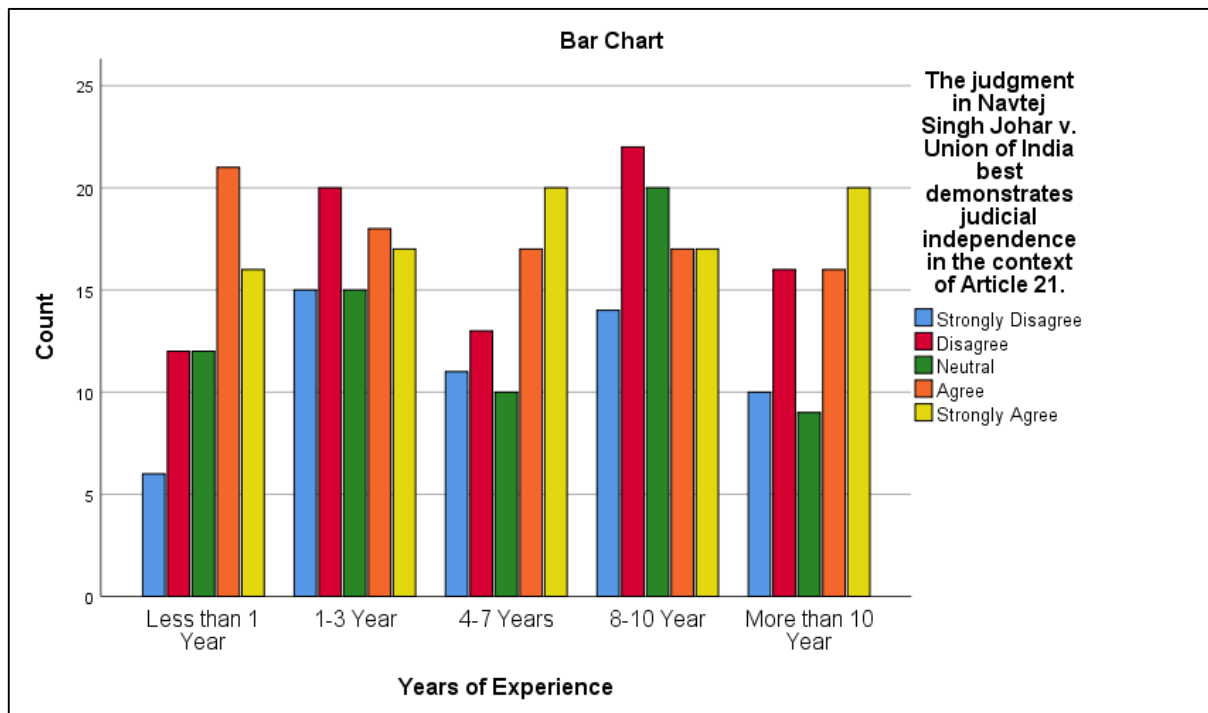


Figure 10: Judicial Independence: Navtej Singh Johar v. Union of India

Influence of Recent Judgments on Indian Jurisprudence

Recent judgments on Article 21 have greatly influenced the course of Indian jurisprudence (see Table 11 and Figure 11). The survey results reveal significant gender differences in responses. Males are more likely to disagree (49) and strongly disagree (37) compared to females (37 and 25, respectively). Males also have more neutral responses (38) than females (26). When it comes to agreement, males (51) are slightly more likely to agree than females (40). Interestingly, both genders show almost equal levels of strong agreement, with males at 41 and females at 40. These findings suggest that males tend to have more polarized views, with higher tendencies toward both disagreement and agreement, while females generally maintain a more moderate and consistent stance.

Table 11: Influence of Recent Judgments on Indian Jurisprudence

Parameter	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree	Total
Male	37	49	38	51	41	216
Female	25	37	26	40	40	168
Total	62	86	64	91	81	384

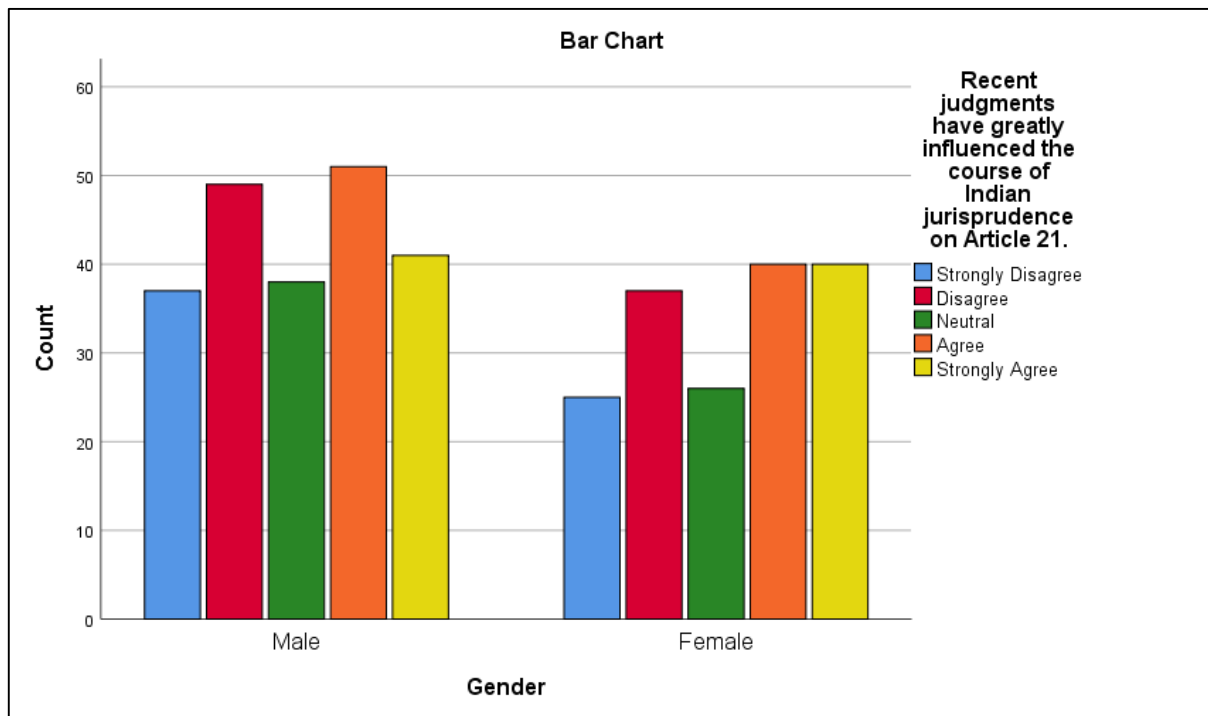


Figure 11: Influence of Recent Judgments on Indian Jurisprudence

Role of Public Interest Litigation in Shaping Article 21 Jurisprudence

Public interest litigation has played a crucial role in shaping the jurisprudence of Article 21 (see Table 12 and Figure 12). The data reveals diverse responses across different age groups. Individuals under 20 years old exhibit a strong tendency towards strong agreement (19) and agreement (14), indicating a generally positive outlook. The 20-30 year age group shows a notable inclination towards disagreement (26) and strong disagreement (18), with a significant number also strongly agreeing (20), suggesting a polarized set of opinions. In the 31-40 year age group, the first subset shows a balanced mix of strong agreement (19) and agreement (18), while the second subset displays a higher tendency to disagree (22) and strongly disagree (16), indicating varied perspectives within this age range. Respondents over 50 years exhibit a relatively even distribution, with slight peaks in strong agreement (14) and agreement (12). These findings suggest that younger respondents (under 20) generally have more positive views, while the 20-30 year age group shows more polarized opinions. Older respondents (over 50) maintain a balanced and moderate perspective, reflecting a diversity of opinions across different age groups.

Table 12: Role of Public Interest Litigation in Shaping Article 21 Jurisprudence

1. Parameter	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree	Total
Under 20 Year	8	12	14	14	19	67
20-30 Year	18	26	18	17	20	99
31-40 Year	14	10	17	18	19	78
31-40 Year	16	22	8	17	15	78
Over 50 Year	14	12	10	12	14	62
Total	70	82	67	78	87	384

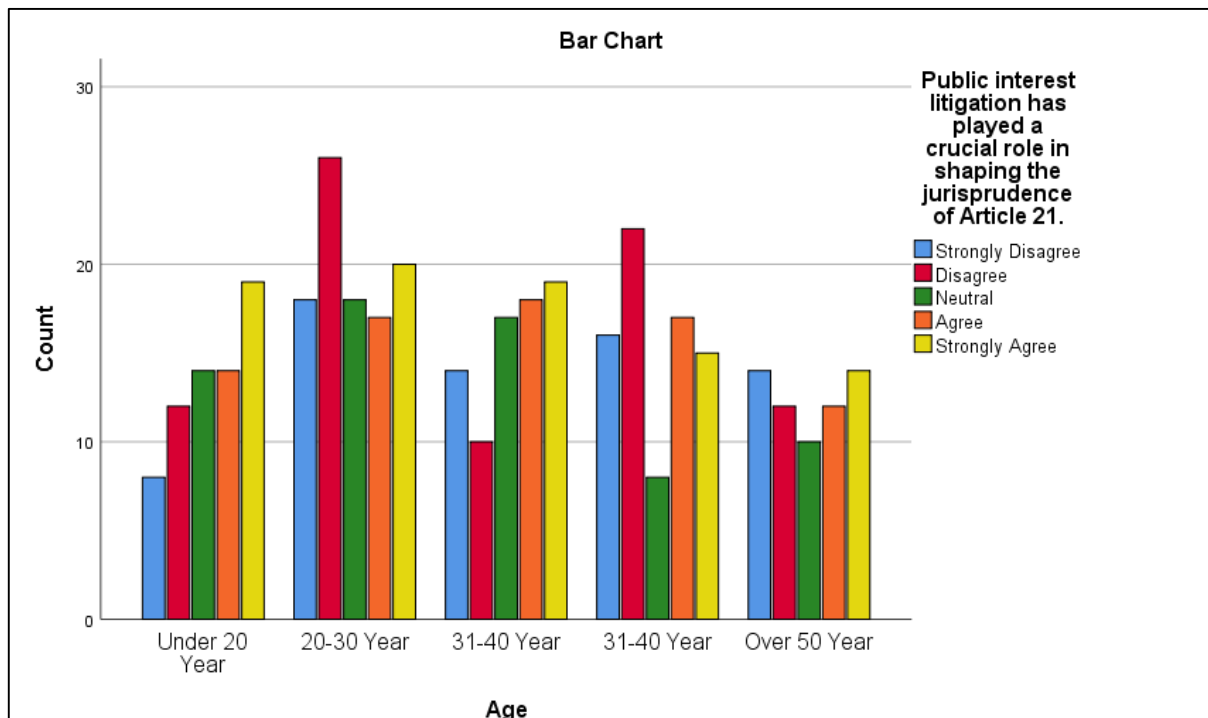


Figure 12: Role of Public Interest Litigation in Shaping Article 21 Jurisprudence

Need for Judicial Attention on Environmental Rights

There is a need for more judicial attention on environmental rights under Article 21 (see Table 13 and Figure 13). The data illustrates diverse responses across different professional groups within the legal field. Law students display a fairly balanced distribution, with a significant number of neutral responses (21) and a notable inclination towards disagreement (18) and strong agreement (18), indicating mixed but generally moderate views. Academics and professors in law show a broad range of opinions, with peaks in strong agreement (27), disagreement (28), and neutrality (18), suggesting diverse but slightly positive perspectives. Legal researchers exhibit similar diversity, with high levels of strong agreement (27) and disagreement (26), reflecting polarized views. Practicing lawyers show moderate opinions, with concentrations in disagreement (14) and agreement (11), indicating a balanced stance with fewer extremes. The "Other" category presents a varied distribution, with a notable number of strong agreement (17) and disagreement (9), suggesting a mixed but slightly positive perspective. These findings suggest that law students and legal researchers exhibit diverse opinions, academics lean towards a positive but varied outlook, practicing lawyers maintain a moderate stance, and other respondents show a balanced range of responses with a positive tilt.

Table 13: Need for Judicial Attention on Environmental Rights

Parameter	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree	Total
Law Student	13	18	21	12	18	82
Academic/Professor in Law	12	28	18	18	27	103
Legal Researcher	13	26	18	15	27	99
Practicing Lawyer	8	14	7	11	10	50
Other	9	8	9	7	17	50
Total	55	94	73	63	99	384

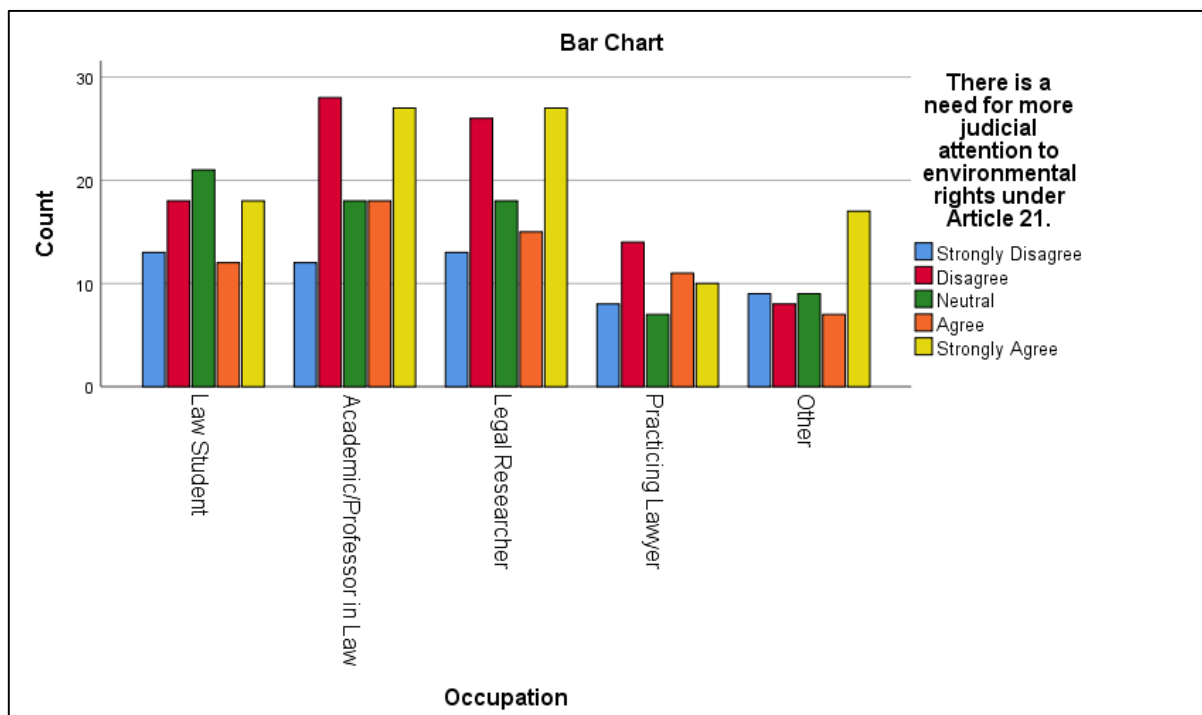


Figure 13: Need for Judicial Attention on Environmental Rights

Judiciary's Proactivity in Responding to Emerging Challenges

The judiciary has been proactive in responding to emerging challenges within the scope of Article 21 (see Table 14 and Figure 14). The data reveals varied responses among legal professionals. Law students show a strong inclination towards agreement (22) and strong agreement (26), indicating generally positive views. Academics and professors in law exhibit a diverse range of opinions with notable peaks in disagreement (29) and strong agreement (23). Legal researchers display polarized views, with significant strong agreement (27) and strong disagreement (20). Practicing lawyers have balanced responses, with peaks in neutrality (14) and moderate agreement (11). The "Other" category shows mixed opinions, with slight peaks in strong agreement (15) and disagreement (12).

Table 14: Judiciary's Proactivity in Responding to Emerging Challenges

Parameter	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree	Total
Law Student	18	7	9	22	26	82
Academic/Professor in Law	18	29	13	20	23	103
Legal Researcher	20	13	20	19	27	99
Practicing Lawyer	10	4	14	11	11	50
Other	8	12	5	10	15	50
Total	74	65	61	82	102	384

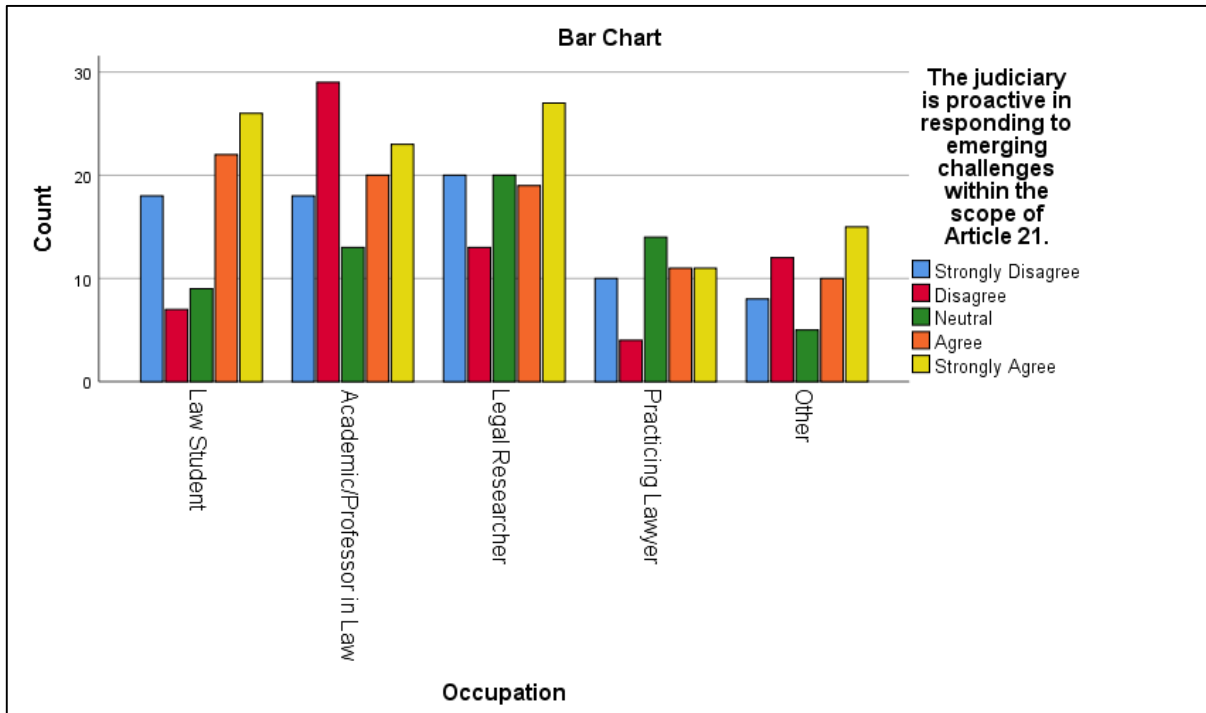


Figure 14: Judiciary's Proactivity in Responding to Emerging Challenges

Improvement of the Human Rights Situation in India Through Article 21

The scope of Article 21 by the judiciary has significantly improved the overall human rights situation in India (see Table 15 and Figure 15). The data shows varied opinions based on experience. Less than 1 year favor agreement (16) and strong agreement (15). 1-3 years lean positive with high strong agreement (25) and neutrality (18). 4-7 years favor agreement (23) and strong agreement (18). 8-10 years show peaks in agreement (29) and neutrality (17). More than 10 years favor strong agreement (20).

Table 15: Improvement of the Human Rights Situation in India Through Article 21

Parameter	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree	Total
Less than 1 Year	11	11	14	16	15	67
1-3 Year	13	14	18	15	25	85
4-7 Years	8	16	6	23	18	71
8-10 Year	16	14	17	29	14	90
More than 10 Year	14	13	13	11	20	71
Total	62	68	68	94	92	384

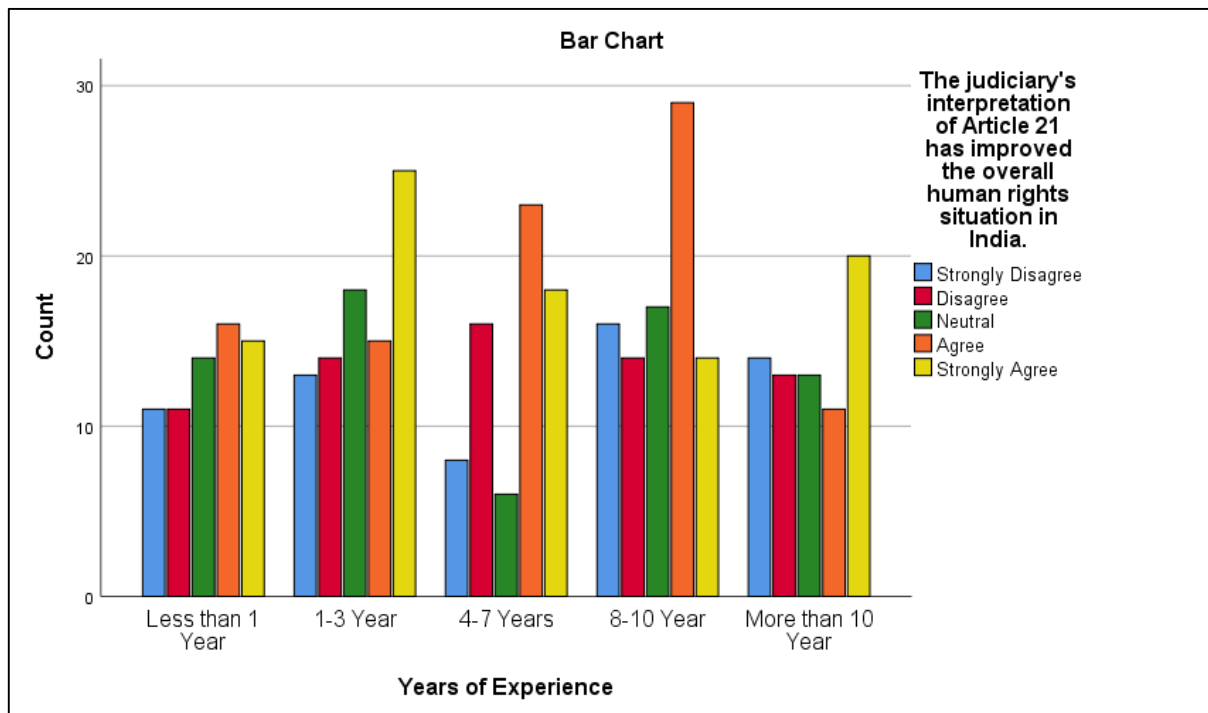


Figure 15: Improvement of the Human Rights Situation in India Through Article 21

Influence of Political Factors on Judiciary Decisions

The influence of political factors is highly significant (see Table 16 and Figure 16). The survey results underscore distinct differences in how males and females responded. Males are significantly more likely to strongly agree (58) and agree (50) compared to females (42 and 37, respectively). Additionally, males have a higher number of neutral responses (38) than females (32). In terms of disagreement, males are more inclined to disagree (40) and strongly disagree (30) compared to females (34 and 23, respectively). These results suggest that males exhibit more pronounced opinions, showing both stronger agreement and disagreement, whereas females tend to have a more balanced and moderate view overall. This indicates a tendency for males to have more extreme opinions, while females maintain a steadier range of responses.

Table 16: Influence of Political Factors on Judiciary Decisions

Parameter	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree	Total
Male	30	40	38	50	58	216
Female	23	34	32	37	42	168
Total	53	74	70	87	100	384

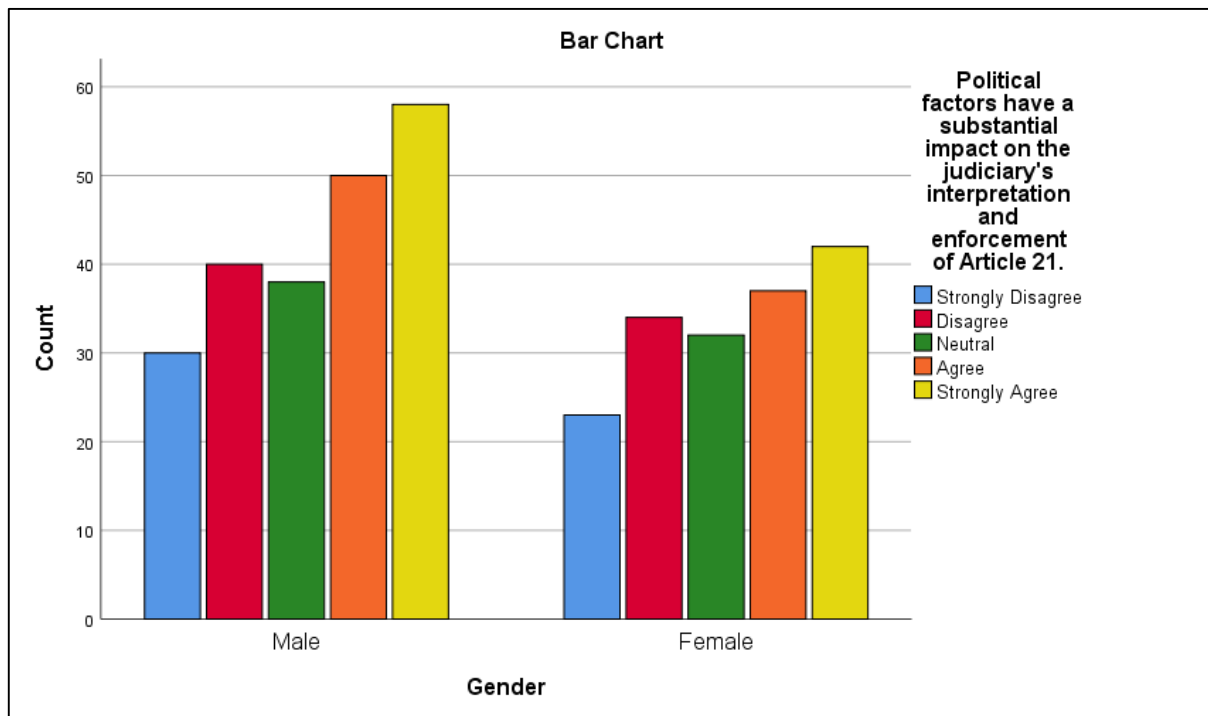


Figure 16: Influence of Political Factors on Judiciary Decisions

Influence of Social Movements on Judicial Decisions

Social movements have greatly influenced judicial decisions (see Table 17 and Figure 17). The data highlights distinct patterns in responses across different age groups. Individuals under 20 years old show a strong inclination towards strong agreement (26) and agreement (13), suggesting a generally positive outlook. The 20-30 year age group displays significant disagreement (29) and strong agreement (22), indicating a mix of strong positive and negative opinions. For the first subset of the 31-40 year age group, neutral (18) and strong agreement (19) responses are notable, showing a balanced perspective. The second subset within this age range leans towards strong agreement (24) and agreement (20), indicating a more positive outlook. Respondents over 50 years exhibit a balanced distribution, with peaks in strong agreement (21) and neutrality (11). These findings suggest that younger respondents (under 20) tend to have more positive views, while the 20-30 year age group shows a mix of strong opinions. The 31–40-year age group displays varied perspectives, and older respondents (over 50) maintain a balanced and moderate stance.

Table 17: Influence of Social Movements on Judicial Decisions

Parameter	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree	Total
Under 20 Year	9	13	6	13	26	67
20-30 Year	12	29	17	19	22	99
31-40 Year	11	19	18	11	19	78
31-40 Year	7	16	11	20	24	78
Over 50 Year	11	7	11	12	21	62
Total	50	84	63	75	112	384

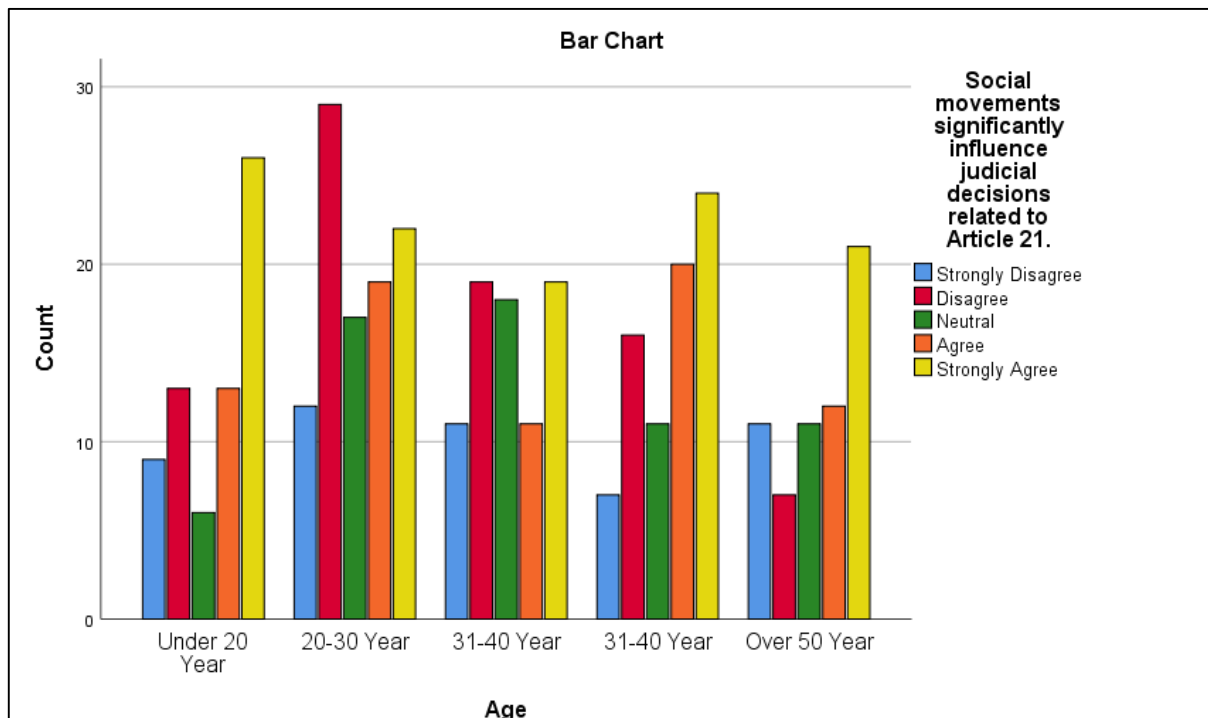


Figure 17: Influence of Social Movements on Judicial Decisions

Susceptibility of the Judiciary to Political Pressure

The judiciary is susceptible to political pressure when enforcing Article 21 (see Table 18 and Figure 18). The data highlights varied responses across different legal professional groups. Law students show balanced views with notable neutrality (22) and disagreement (17). Academics and professors in law lean towards strong agreement (30) and agreement (22), suggesting a generally positive outlook. Legal researchers exhibit a mix of strong agreement (17) and agreement (28), along with significant disagreement (22) and strong disagreement (19), reflecting polarized but mostly positive views. Practicing lawyers display moderate responses with a concentration in agreement (12) and strong agreement (14). The "Other" category shows a varied distribution with slight peaks in strong disagreement (10) and disagreement (11), indicating a mixed but moderate perspective.

Table 18: Susceptibility of the Judiciary to Political Pressure

Parameter	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree	Total
Law Student	15	17	22	15	13	82
Academic/Professor in Law	8	20	23	22	30	103
Legal Researcher	19	22	13	28	17	99
Practicing Lawyer	7	8	9	12	14	50
Other	10	11	10	9	10	50
Total	59	78	77	86	84	384

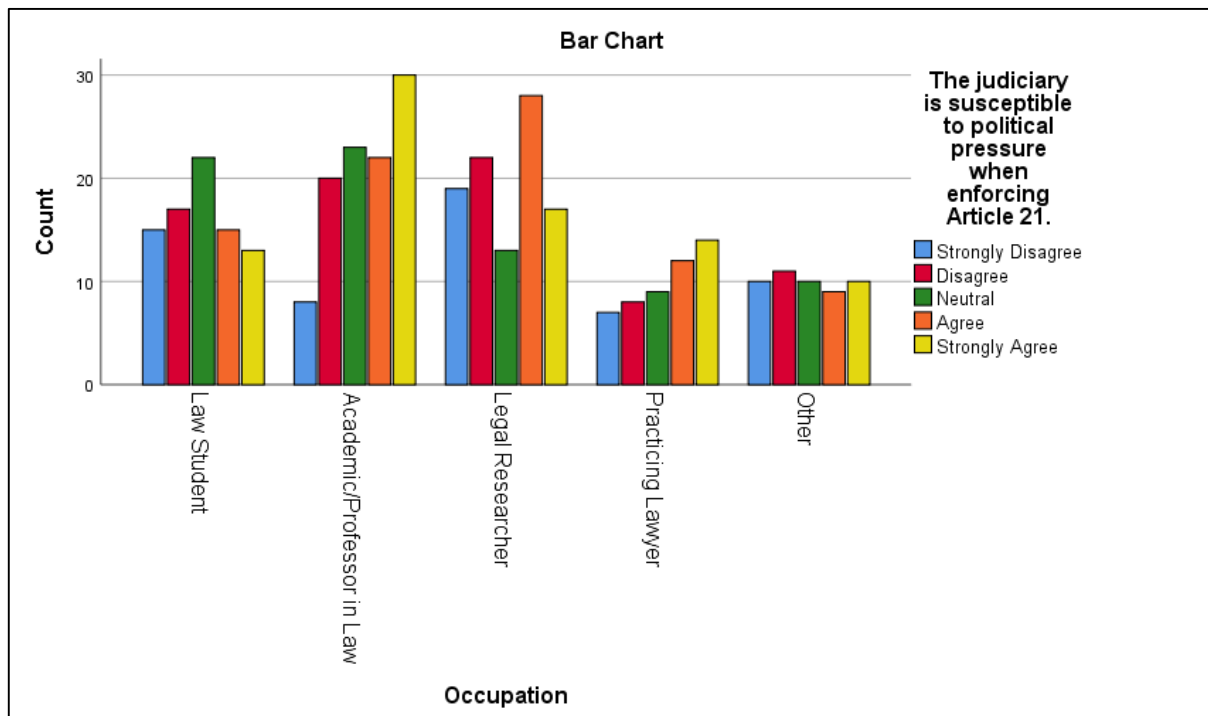


Figure 18: Susceptibility of the Judiciary to Political Pressure

Impact of Public Opinion on Judicial Decisions

The impact of public opinion is very high (see Table 19 and Figure 19). The data highlights diverse responses across different age groups. Individuals under 20 years old have a relatively even distribution, with the highest responses in neutrality (16) and slight disagreement (14), suggesting a generally balanced perspective. The 20-30 year age group shows a strong inclination towards strong agreement (28) and agreement (22), indicating a predominantly positive outlook. In contrast, the first group within the 31-40 year range displays a balanced mix, with neutrality (21) and agreement (21) being prominent. The second group within the 31-40 year range also shows varied responses, with agreement (24) and neutrality (13) leading. Respondents over 50 years exhibit a more even spread, with strong agreement (16) and strong disagreement (14) being notable. These findings suggest that younger respondents (20-30 years) tend to have more positive views, while older respondents (over 50 years) maintain a more balanced and diverse range of opinions, reflecting different perspectives across age groups.

Table 19: Impact of Public Opinion on Judicial Decisions

Parameter	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree	Total
Under 20 Year	12	14	16	13	12	67
20-30 Year	6	22	21	22	28	99
31-40 Year	8	17	21	21	11	78
31-40 Year	11	16	13	24	14	78
Over 50 Year	14	10	11	11	16	62
Total	51	79	82	91	81	384

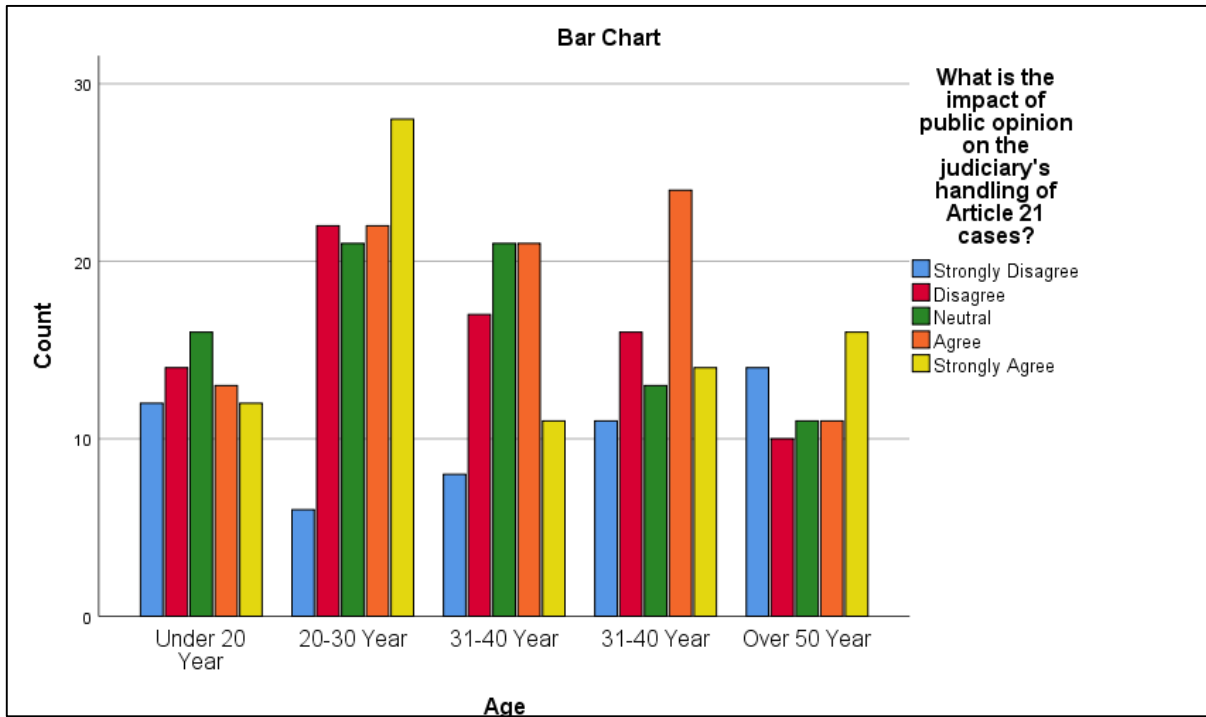


Figure 19: Impact of Public Opinion on Judicial Decisions

Balancing Societal Values and Legal Principles

The judiciary balances societal values and legal principles extremely well (see Table 20 and Figure 20). The data reveals varied opinions based on experience. Less than 1 year favor neutrality (16) and agreement (16). 1-3 years show balanced views with peaks in neutrality (20) and disagreement (17). 4-7 years lean positive with strong agreement (19) and agreement (16). 8-10 years favor neutrality (23) and agreement (22). More than 10 years show mixed views with peaks in strong agreement (17) and neutrality (17).

Table 20: Balancing Societal Values and Legal Principles

Parameter	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree	Total
Less than 1 Year	7	16	16	16	12	67
1-3 Year	15	17	20	18	15	85
4-7 Years	9	10	17	16	19	71
8-10 Year	10	19	23	22	16	90
More than 10 Year	11	11	17	15	17	71
Total	52	73	93	87	79	384

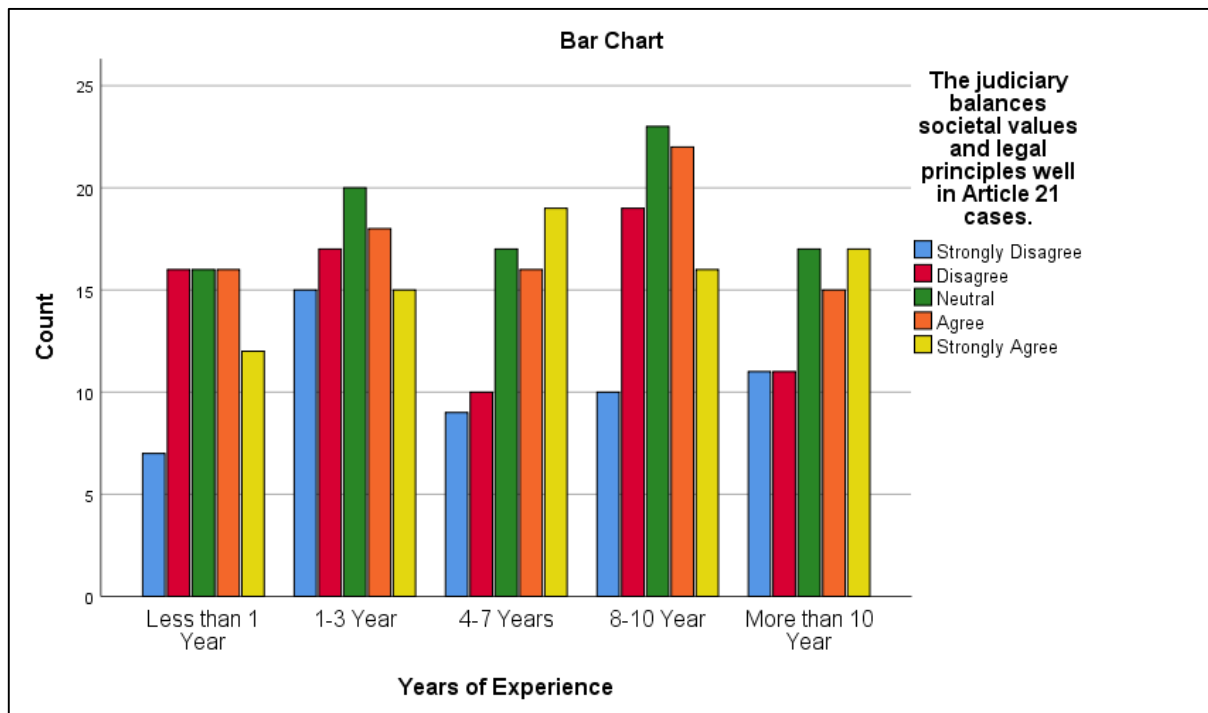


Figure 20: Balancing Societal Values and Legal Principles

Navigating Article 21 with Emerging Social Issues

The judiciary navigates the intersection of Article 21 with emerging social issues very effectively (see Table 21 and Figure 21). The data highlights noticeable gender differences in responses. Males exhibit a higher tendency to strongly agree (50) and agree (54) compared to females (32 and 37, respectively). Moreover, males show an equal number of neutral responses (34) but have fewer instances of disagreement (44) and strong disagreement (34) compared to females, who display higher disagreement (47) and strong disagreement (23). These observations suggest that males are more likely to have strong positive opinions, while females tend to be more critical, showing higher levels of disagreement. This pattern indicates that males lean towards stronger positive responses, whereas females present a more balanced, yet slightly critical perspective.

Table 21: Navigating Article 21 with Emerging Social Issues

Parameter	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree	Total
Male	34	44	34	54	50	216
Female	23	47	29	37	32	168
Total	57	91	63	91	82	384

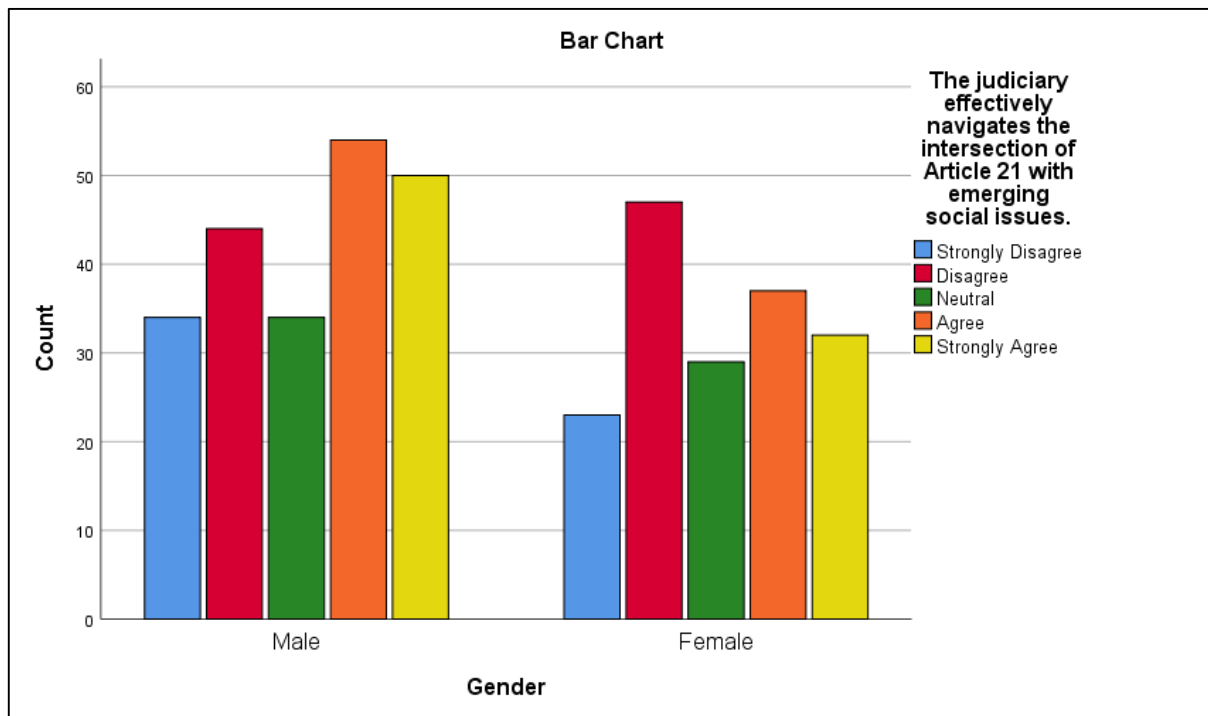


Figure 21: Navigating Article 21 with Emerging Social Issues

Influence of Economic Factors on Judicial Decisions

Economic factors play a significant role in the judiciary (see Table 22 and Figure 22). The data illustrates varied responses across different age groups. For individuals under 20 years old, agreement (16) and neutrality (15) are most common, indicating a generally balanced perspective. The 20-30 year age group shows a strong tendency towards agreement (26), with notable responses in strong agreement (19) and neutrality (19), suggesting a predominantly positive outlook. The first subset of the 31-40 year age group exhibits a balanced distribution, with strong agreement (18) and neutrality (15) being frequent. The second subset within this age range also displays a balanced mix, with agreement (19) and neutrality (18) being notable. Respondents over 50 years demonstrate a balanced distribution, with peaks in strong agreement (19) and agreement (17). These findings suggest that younger respondents (under 20) have a more moderate view, while the 20-30 year age group tends to be more positive. The 31-40 year age group shows a mix of balanced perspectives, and older respondents (over 50) maintain a generally positive stance.

Table 22: Influence of Economic Factors on Judicial Decisions

Parameter	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree	Total
Under 20 Year	10	11	15	16	15	67
20-30 Year	17	18	19	26	19	99
31-40 Year	15	14	15	16	18	78
31-40 Year	12	12	18	19	17	78
Over 50 Year	8	10	8	17	19	62
Total	62	65	75	94	88	384

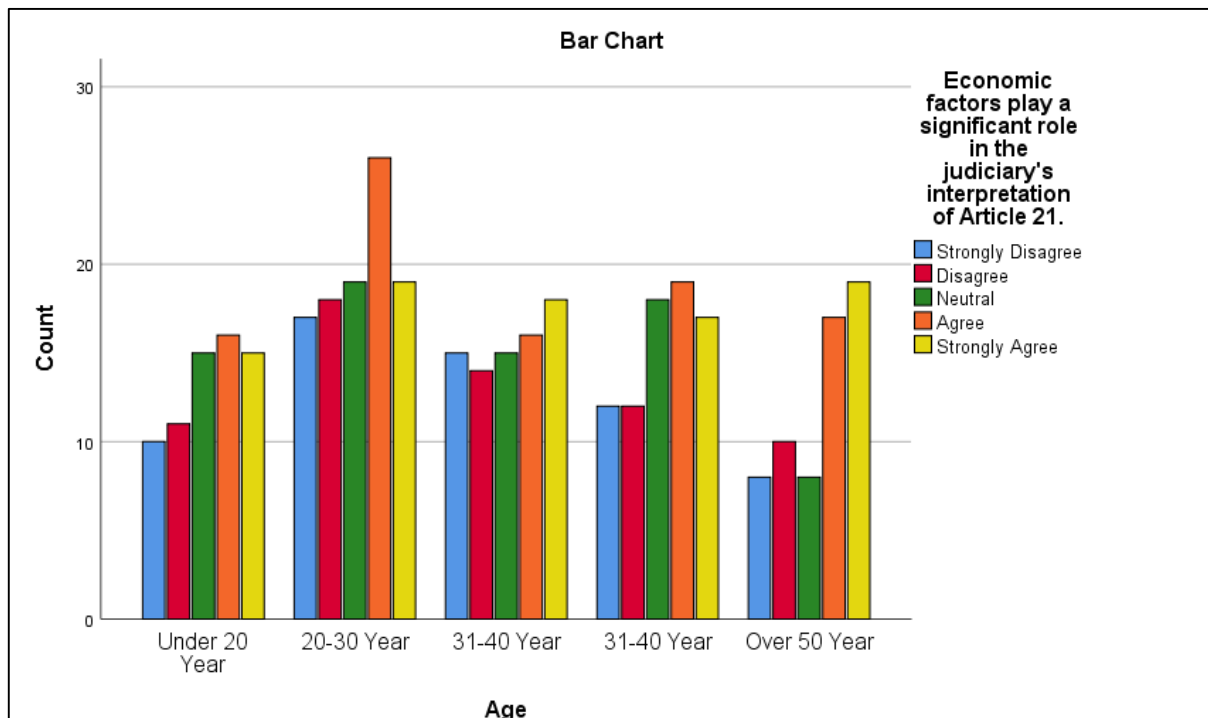


Figure 22: Influence of Economic Factors on Judicial Decisions

Significance of Cultural Norms in Shaping Judicial Approach

Cultural norms are very significant in shaping the judiciary’s approach (see Table 23 and Figure 23). The data shows varied responses among legal professionals. Law students have balanced views, with significant disagreement (19) and agreement (20). Academics lean towards agreement (30) and neutrality (24). Legal researchers are polarized but mainly positive, with high agreement (31) and strong agreement (23). Practicing lawyers show moderate responses, with strong agreement (16) and disagreement (14). The "Other" category is mixed, with peaks in agreement (15) and neutrality (8).

Table 23: Significance of Cultural Norms in Shaping Judicial Approach

Parameter	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree	Total
Law Student	14	19	13	20	16	82
Academic/Professor in Law	16	16	24	30	17	103
Legal Researcher	11	21	13	31	23	99
Practicing Lawyer	1	14	7	12	16	50
Other	9	9	8	15	9	50
Total	51	79	65	108	81	384

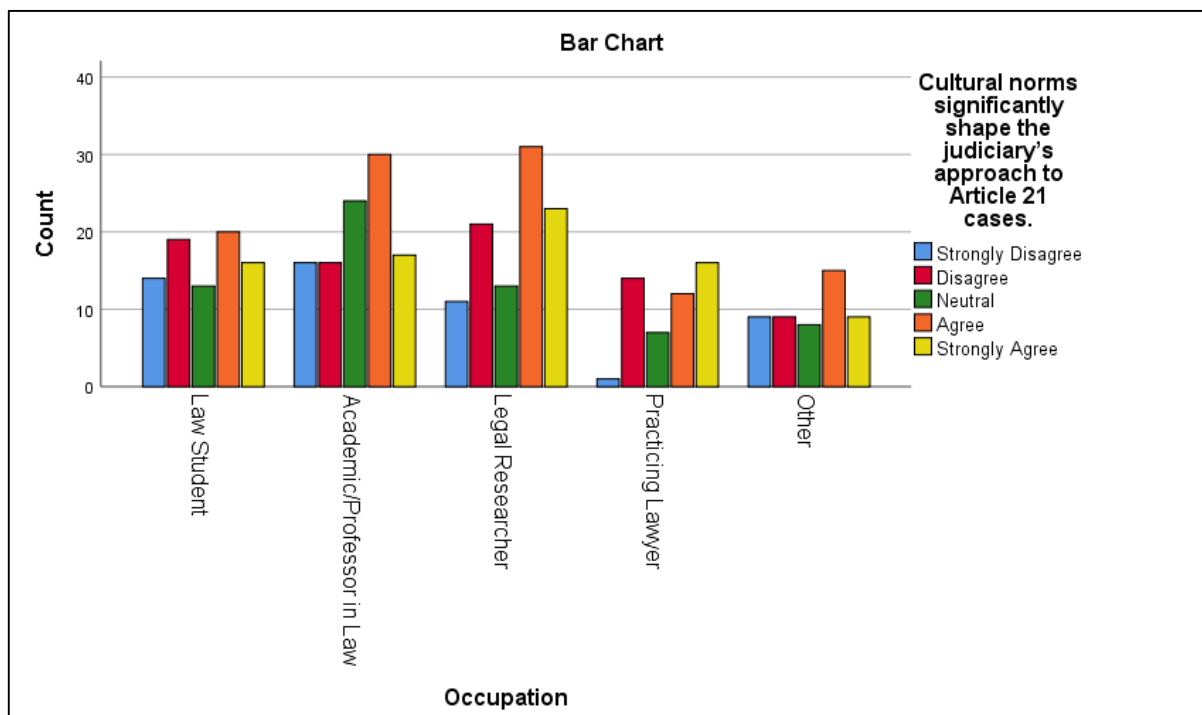


Figure 23: Significance of Cultural Norms in Shaping Judicial Approach

Influence of Media Portrayal on Judicial Decision-Making

The media's portrayal affects the judiciary's decision-making process (see Table 24 and Figure 24). The data reveals varied responses among legal professionals. Law students show balanced views, with notable peaks in disagreement (19) and agreement (19). Academics and professors in law lean towards agreement (26) and neutrality (23), suggesting generally positive perspectives. Legal researchers display polarized views, with significant agreement (29) and strong agreement (26), alongside notable disagreement (20). Practicing lawyers have moderate responses, with peaks in strong agreement (15) and disagreement (8). The "Other" category shows a mixed distribution, with slight peaks in agreement (14) and strong disagreement (11).

Table 24: Influence of Media Portrayal on Judicial Decision-Making

Parameter	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree	Total
Law Student	11	19	18	19	15	82
Academic/Professor in Law	18	16	23	26	20	103
Legal Researcher	16	20	8	29	26	99
Practicing Lawyer	9	8	8	10	15	50
Other	11	8	7	14	10	50
Total	65	71	64	98	86	384

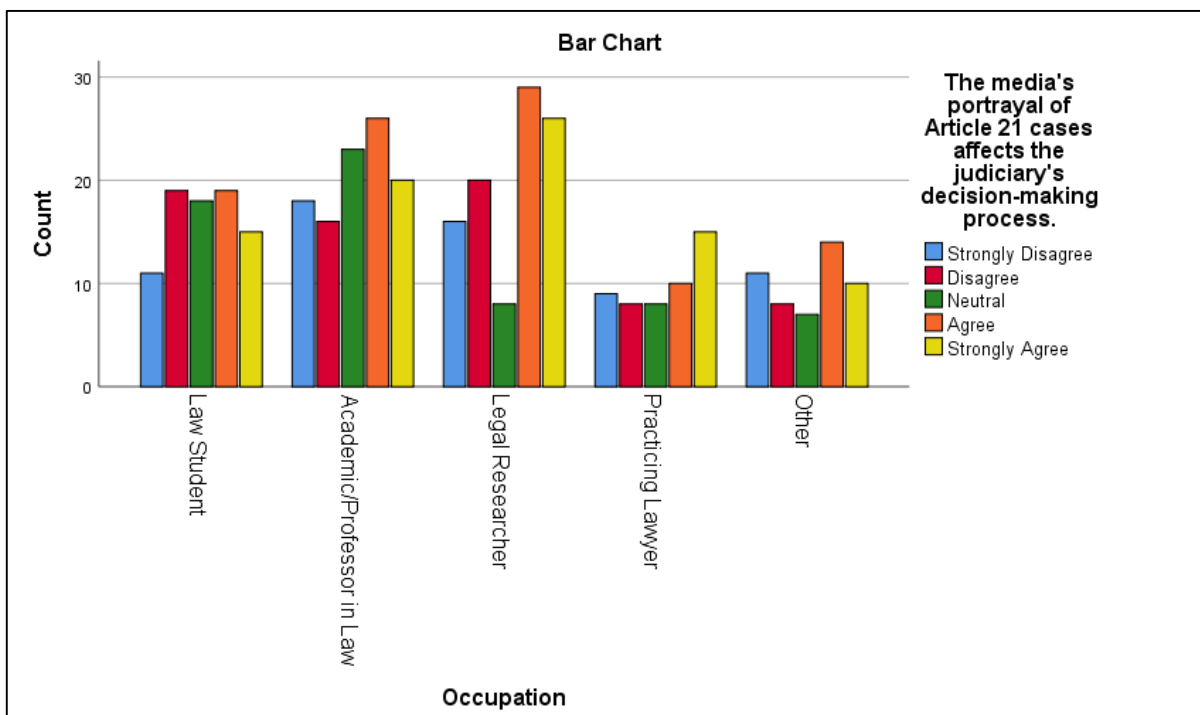


Figure 24: Influence of Media Portrayal on Judicial Decision-Making

Impact of the Changing Political Landscape on the Judiciary

The changing political landscape has significantly impacted the judiciary’s handling of cases (see Table 25 and Figure 25). The data shows varied opinions based on experience. Less than 1 year favor strong agreement (19) and agreement (17). 1-3 years show balanced views with peaks in neutrality (19) and agreement (19). 4-7 years lean positive with strong agreement (20) and agreement (21). 8-10 years show high agreement (25) and balanced strong agreement (17). More than 10 years favor strong agreement (19) and show mixed views.

Table 25: Impact of the Changing Political Landscape on the Judiciary

Parameter	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree	Total
Less than 1 Year	8	6	17	17	19	67
1-3 Year	10	20	19	19	17	85
4-7 Years	7	6	17	21	20	71
8-10 Year	17	17	14	25	17	90
More than 10 Year	14	13	12	13	19	71
Total	56	62	79	95	92	384

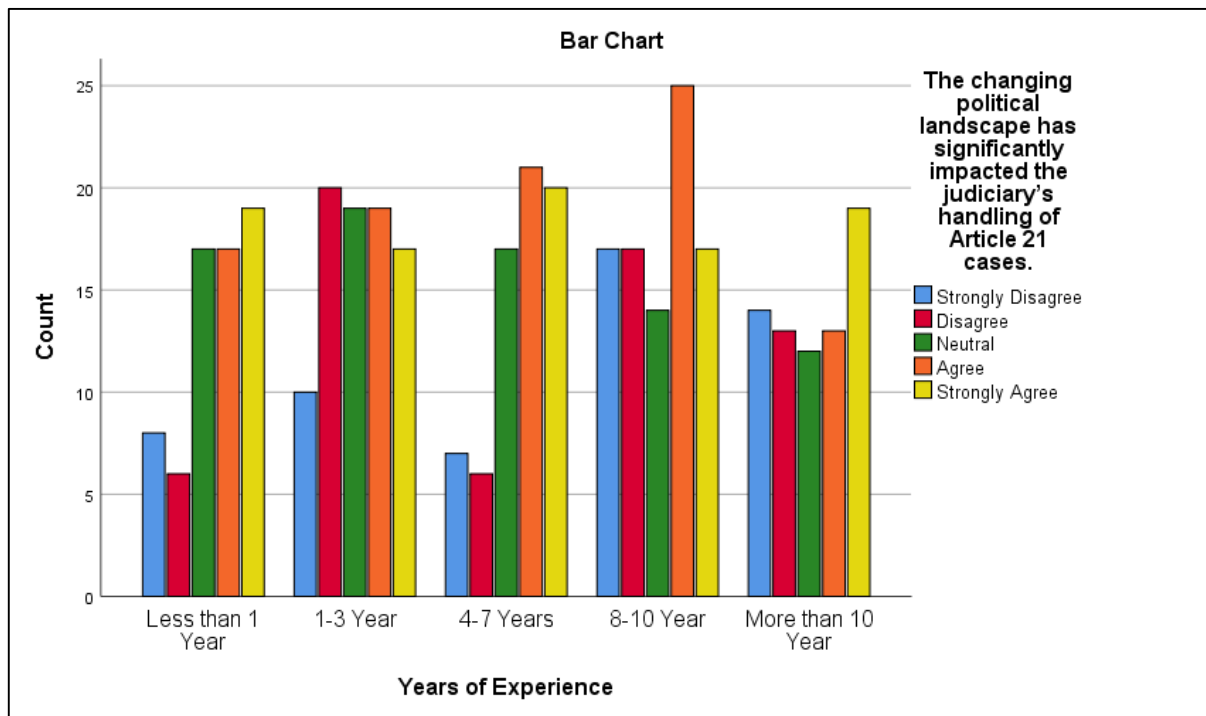


Figure 25: Impact of the Changing Political Landscape on the Judiciary

The impact of political and social factors on the judiciary and enforcement of Article 21 reveals a nuanced landscape where political influences, social movements, and public opinion play significant roles in shaping judicial decisions. Concerns about susceptibility to political pressure and the effects of economic factors and cultural norms suggest that external influences are perceived to have a substantial impact on judicial independence. However, there's also a recognition of the judiciary's responsiveness to social changes and its efforts to balance societal values with legal principles, especially in the face of emerging social issues. The perceived impact of media narratives and the changing political landscape further highlight the complexity of the environment in which the judiciary operates, underscoring the challenges and pressures faced in upholding the principles enshrined in Article 21. This complex interplay of factors suggests a judiciary that is at once influenced by and responsive to the broader socio-political context, striving to maintain its independence while navigating the multifaceted demands of justice and societal progress.

6. Discussion

The survey data provides a comprehensive overview of the varied perceptions regarding the judiciary's role in interpreting and enforcing Article 21 of the Indian Constitution. Notable findings include the recognition of landmark judgments like the *Maneka Gandhi v. Union of India* case, which received strong agreement from both males (57) and females (45). This underscores the judiciary's significant role in expanding fundamental rights. The alignment of Article 21 with international norms is viewed positively by younger respondents, especially those under 20 years old, who showed 18 agreements and 15 strong agreements. However, the 20-30 age group exhibited a polarized perspective with 25 strong disagreements, reflecting diverse attitudes towards global influences.

The right to privacy, as a crucial judicial development under Article 21, received strong support from law students (25), academics (25), and legal researchers (33). This indicates a broad consensus on the importance of privacy rights. The influence of international human rights norms was strongly agreed upon by law students (24) and practicing lawyers (18), highlighting the judiciary's openness to global standards. Gender differences were evident, with males showing more polarized views on recent judgments, evidenced by 51 agreements and 41 strong agreements, compared to females who had 40 agreements and 40 strong agreements.

Public interest litigation was particularly valued by younger respondents, with 19 under 20 years old strongly agreeing on its importance. The need for more judicial attention to environmental rights was highlighted by the polarized responses of legal researchers (27 strong agreements, 26 strong disagreements). These findings illustrate the judiciary's ongoing challenge of balancing societal values with legal principles while maintaining independence amidst various external influences.

7. Conclusion

The analysis of survey data on the judiciary's role in interpreting and enforcing Article 21 of the Indian Constitution reveals a complex and nuanced landscape of opinions influenced by gender, age, professional background, and experience. The survey, involving 384 respondents, provides significant insights into how different demographic groups perceive the judiciary's actions and decisions. Key findings include the impact of landmark judgments, such as the *Maneka Gandhi v. Union of India* case, which was strongly agreed upon by 57 males and 45 females as having expanded the scope of Article 21. This indicates a broad recognition of the judiciary's role in enhancing fundamental rights. Additionally, the alignment of Article 21 with international norms was viewed positively by younger respondents, with 18 agreements and 15 strong agreements among those under 20 years old. In contrast, the 20-30 age group displayed a more polarized view, with 25 strong disagreements, suggesting varying degrees of acceptance of international influences. The right to privacy emerged as a critical area of judicial development under Article 21, with significant support from law students (25 strong agreements), academics (25 strong agreements), and legal researchers (33 agreements). This highlights the judiciary's role in protecting individual rights in the face of evolving social and legal challenges.

Regarding the influence of international human rights norms, law students (24 strong agreements) and practicing lawyers (18 strong agreements) acknowledged their impact on Article 21. The recognition of judicial independence was evident in the response to the *Navtej Singh Johar v. Union of India* case, particularly among respondents with over 10 years of experience, with 20 strong agreements. Gender differences were also notable, with males showing 51 agreements and 41 strong agreements on the influence of recent judgments, while females displayed 40 agreements and 40 strong agreements. This suggests that males tend to have more polarized views, while females maintain a more balanced perspective. Public interest litigation was highly regarded, particularly by respondents under 20 years old, with 19 strong agreements. The need for more judicial attention to environmental rights was underscored by the polarized views of legal researchers, who showed 27 strong agreements and 26 strong disagreements.

8. Policy Recommendations

- Enhanced Judicial Training:** Implement continuous training programs for judges focusing on international human rights norms and their application within the Indian context. This will help in aligning Article 21 interpretations with global standards and improving judicial consistency.
- Public Awareness Campaigns:** Launch initiatives to educate the public, especially younger demographics, about the significance of landmark judgments and the evolving scope of Article 21. This can foster informed civic engagement and support for judicial decisions.
- Strengthening Public Interest Litigation (PIL):** Encourage and facilitate PILs to address emerging social issues, particularly environmental rights. This could include providing legal aid and support for individuals and organizations filing PILs.
- Judicial Independence Safeguards:** Develop and enforce policies to protect the judiciary from political and economic pressures. This includes establishing clear guidelines and mechanisms to ensure unbiased and fair judicial processes.
- Promoting Gender Balance:** Address gender disparities in judicial perceptions by promoting diversity within the judiciary and fostering an inclusive environment. This could involve targeted recruitment and mentorship programs for female legal professionals.
- Enhanced Data Collection:** Invest in comprehensive data collection and analysis on judicial decisions and public perceptions to identify trends and areas for improvement. This will support evidence-based policy-making and judicial reforms.
- Focus on Environmental Jurisprudence:** Prioritize judicial attention on environmental rights under Article 21 by creating specialized environmental courts or benches. This ensures dedicated focus and expertise in handling complex environmental cases.

9. Future Scope

Future research should investigate the evolving impact of environmental rights and public interest litigation on Article 21 interpretations, focusing on the judiciary's response to emerging social issues. Additionally, analyzing the influence of professional and demographic factors on judicial perceptions could offer valuable insights for legal reforms and policy-making.

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