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Parliamentary Privileges, Freedom of Speech and Judicial Review

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ABSTRACT

Parliamentary privileges refer to legal immunity enjoyed by certain members of the legislative houses of particular countries. These privileges provide immunity in the form of protection from civil and criminal acts. These acts include statements made and actions done by these members in the course of their legislative duties. They have also been defined under Article 105 of the Indian Constitution. This research work talks about the types of parliamentary privileges and their relation with freedom of speech and judicial review. Parliamentary privileges and Freedom of Speech go hand-in-hand. Article 105 of the Constitution of India deals with the powers, privileges and immunities of the Houses of Parliament, their members and committees. This article guarantees freedom of speech to every member in Parliament. Further, it also grants these members immunity from proceedings in any court of law in respect of anything said or any vote given by him/her in Parliament or in any of its committees. Are these privileges subject to judicial review? Judicial review refers to the power of the judiciary to interpret the Constitution and declare any law enacted or order passed by the state as void, if the court thinks it to be unconstitutional. Parliamentary privileges and judicial review place the legislature and the judiciary face-to-face. On one hand, the Parliament claims absolute sovereignty when it comes to its privileges, and on the other hand the Judiciary does not accept any kind of restraint on its judicial review power. This has led to numerous conflicts between the two highest organs of the State. Emphasis has also been laid on whether parliamentary sovereignty is immune from judicial review citing the examples of India and the United Kingdom. This research work aims to display how these three broad terms complement each other in the modern context.

I. INTRODUCTION

(A) Parliamentary Privileges

Parliamentary privileges refer to legal immunity enjoyed by certain members of the legislative houses of particular countries. These privileges provide immunity in the form of protection

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from civil and criminal acts. These acts include statements made and actions done by these members in the course of their legislative duties.

In India, parliamentary privileges have been defined in Article 105 of the Indian Constitution.

“105. Powers, privileges, etc., of the Houses of Parliament and of the members and committees thereof.- (1) *Subject to the provisions of this Constitution and to the rules and standing orders regulating the procedure of Parliament, there shall be freedom of speech in Parliament.*

(2) *No member of Parliament shall be liable to any proceedings in any court in respect of anything said or any vote given by him in Parliament or any committee thereof, and no person shall be so liable in respect of the publication by or under the authority of either House of Parliament of any report, paper, votes or proceedings.*

(3) *In other respects, the powers, privileges and immunities of each House of Parliament, and of the members and the committees of each House, shall be such as may from time to time be defined by Parliament by law, and, until so defined, [shall be those of that House and of its members and committees immediately before the coming into force of section 15 of the Constitution (Forty-fourth Amendment) Act, 1978].*

(4) *The provisions of clauses (1), (2) and (3) shall apply in relation to persons who by virtue of this Constitution have the right to speak in, and otherwise to take part in the proceedings of, a House of Parliament or any committee thereof as they apply in relation to members of Parliament.”²*

In the United Kingdom, parliamentary privileges have more or less the same meaning. The official definition says that parliamentary privilege provides certain legal immunities to Members of both the Houses. The objective is to let the members perform their duties without any interference from outside the house. Freedom of speech and the right of both Houses to regulate their own affairs forms part of these privileges.³

In the American Constitution, Article I, Section 6, contains provisions pertaining to parliamentary privilege. Article I, Section 6 of the American Constitution says that: -

“[Senators and Representatives] shall in all Cases, except Treason, Felony and Breach of the Peace, be privileged from Arrest during their Attendance at the Session of their respective Houses, and in going to and returning from the same; and for any Speech or Debate in either

² INDIA CONST. art. 105.

³ Elizabeth Hurst, *The history of parliamentary privilege*, ALL ABOUT LAW (Jun. 6, 2019, 4:38 PM), <https://www.allaboutlaw.co.uk/commercial-awareness/legal-spotlight/the-history-of-parliamentary-privilege>.

House, they shall not be questioned in any other Place."⁴

(B) Freedom of Speech

Freedom of Speech is regarded as one of the most important natural rights all across the globe. This right is acquired by an individual on birth and hence, it is a basic right. Freedom of speech includes the right to have and express one's own opinion. Everyone has the right to freedom of opinion and expression; the right includes freedom to hold opinions without interference and to seek, receive and impart information and ideas through any media and regardless of frontiers.⁵ However, this right also has certain restrictions and the people cannot have absolute access to it. This is because man, being rational, has indefinite desires but, in a civil society these desires need to be controlled and restrictions need to be placed on them so that the needs and desires of all human beings can be regulated and reconciled.

(C) Judicial Review

The Supreme Court is the apex court in India. Being the apex court, it has the responsibility to guard and protect the fundamental rights of the people. Also, it has the supreme responsibility of interpreting and protecting the Constitution. It has the power to determine the constitutional validity of the laws enacted by the State. It can reject any law or any part of a law if it thinks that law to be unconstitutional. This is known as the power of judicial review of the Supreme Court. It is the power of the judicial system of any country to interpret the Constitution and declare any law or order of the legislature or executive void, if it is not in conformity with it.⁶

II. TYPES OF PARLIAMENTARY PRIVILEGES

Parliamentary privilege was and still remains an important feature of any parliamentary democracy. It was introduced to prevent any undue interference in the working of Parliament. This enables the Members to function efficiently and effectively without any kind of unreasonable impediment.⁷ In India, Parliamentary privileges have been divided into two broad categories. These are as follows:-

- I. Privileges individually enjoyed by the members.
- II. Privileges enjoyed by the members collectively as part of parliament.

⁴ *The Constitution of the United States*, NATIONAL CONSTITUTION CENTER, <https://constitutioncenter.org/media/files/constitution.pdf>.

⁵ Art. 19, Universal Declaration of Human Rights (Dec. 10, 1948).

⁶ K.K. Ghai, *Judicial Review in India: Meaning, Features and Other Details*, YOUR ARTICLE LIBRARY, <http://www.yourarticlelibrary.com/essay/judicial-review-in-india-meaning-features-and-other-details/40369>.

⁷ Kalpana Mehta & Ors. v. Union of India & Ors., (2018) 7 S.C.C. 1.

(A) Privileges Individually Enjoyed by the Members

Parliamentarians enjoy some privileges as individual members of the House. These privileges are as follows:-

- I. Freedom of Speech
- II. Freedom from Arrest
- III. Exemption from attendance as jurors or witnesses.

(i) Freedom of Speech

Freedom of Speech is one of the many fundamental rights guaranteed by the Indian Constitution. Our Constitution vests the Right of Freedom of Speech in the Members of the Parliament. This is the most important privilege vested with a parliamentarian as it gives him the right to express his views and opinions freely. It exempts him from any liability and thus, he cannot be tried in any court of law. This right provides the Members of Parliament the chance to have a free and fearless discussion.⁸

Article 19(1)(a) of the Indian Constitution deals with the right to freedom of speech and expression. Article 19(1) is as follows:-

“19. Protection of certain rights regarding freedom of speech, etc.- (1) All citizens shall have the right-

(a) to freedom of speech and expression;

(b) to assemble peaceably and without arms;

(c) to form associations or unions; [or co-operative societies]

(d) to move freely throughout the territory of India;

(e) to reside and settle in any part of the territory of India; [and]

(g) to practise any profession, or to carry on any occupation, trade or business.”⁹

Freedom of speech and expression differs for a parliamentarian and any other citizen of the country. Freedom of speech enjoyed by every citizen of this country has been enshrined in Article 19(2) while the parliamentary privilege of freedom of speech has been provided for in Article 105(1) of the Indian Constitution. This freedom is not absolute and is subject to certain restrictions which regulate the proceedings of the parliament. This privilege is also enjoyed by

⁸ Sheetal Sharma, *Parliamentary Privileges and Immunities*, IPLEADERS (Feb. 13, 2018), <https://blog.ipleaders.in/parliamentary-privileges-india/>.

⁹ INDIA CONST. art. 19(1).

certain non-members, like the Attorney General. This aids the House to have a healthy and fearless discussion in which everybody can put forward his opinion.

In the landmark judgement of **Maneka Gandhi v. Union of India**, the Supreme Court said that *“the plain meaning of the clause guaranteeing free speech and expression is that Indian citizens are entitled to exercise that right wherever they choose, regardless of geographical considerations, subject of course to the operation of any existing law or the power of the State to make a law imposing reasonable restrictions in the interests of the sovereignty and integrity of India, the security of the State, friendly relations with foreign States, public order, decency or morality, or in relation to contempt of court, defamation or incitement to an offence, as provided in Article 19(2).”*¹⁰

(ii) Freedom from Arrest

A member of parliament enjoys the privilege of not being liable for arrest or detention during the continuance of a session of a House. Members enjoy the freedom from arrest, in any civil case, 40 days prior and after the adjournment of the house and also when the House is in session. This privilege has also been mentioned in Section 135A of the Code of Civil Procedure, 1908.

“135A. Exemption of members of legislative bodies from arrest and detention under civil process— [(1) No person shall be liable to arrest or detention in prison under civil process—

(a) if he is a member of—

(i) either House of Parliament, or

(ii) the legislative Assembly or Legislative Council of a State, or

(iii) a Legislative Assembly of a Union territory,

during the continuance of any meeting of such House of Parliament or, as the case may be, of the Legislative Assembly or the Legislative Council;

(b) if he is a member of any committee of—

(i) either House of Parliament, or

(ii) the Legislative Assembly of a State or Union territory, or

(iii) the Legislative council of a State,

during the continuance of any meeting of such committee;

¹⁰ Maneka Gandhi v. Union of India & Anr., (1978) 1 S.C.C. 248.

(c) if he is a member of—

(i) either House of Parliament, or

(ii) a Legislative Assembly or Legislative Council of a State having both such Houses, during the continuance of a joint sitting, meeting, conference or joint committee of the Houses of Parliament or Houses of the State Legislature, as the case may be, and during the forty days before and after such meeting, sitting or conference.]

(2) A person released from detention under sub-section (1), shall, subject the provisions, of the said sub-section, be liable to re-arrest and to the further detention to which he would have been liable if he had not been released under the provisions of sub-section (1).¹¹

Every legislature is entitled to have the first claim upon the services of its members. Any person or authority who either obstructs or prevents a member of parliament from attending to his parliamentary duty is guilty of breach of privilege and contempt of the House. Hence, there arises the need for freedom from arrest of the Members of Parliament.¹²

(iii) Exemption from Attendance as Jurors or Witnesses

The Members of Parliament are exempted from attending the Court as witnesses. This a special privilege given to the parliamentarians so that they can have complete liberty to attend the House without the Court acting as a hindrance.¹³

(B) Privileges Enjoyed by the Members Collectively as Part of Parliament

The Members of Parliament enjoy some other privileges as well. These privileges are enjoyed by them collectively as part of the Parliament. These are as follows:-

- I. Right to prohibit the publication of proceedings
- II. Right to exclude strangers
- III. Right to punish members and outsiders for breach of its privileges
- IV. Right to regulate the internal affairs of the House.

(i) Right to Prohibit the Publication of Proceedings

It is important that whatever happens in the house is communicated to the public so that the public becomes aware about what is going on in the Parliament. This is of paramount and national importance. Hence, as has also been stated in article 105(2) of the Constitution of

¹¹ The Code of Civil Procedure, 1908, No. 5, Acts of Parliament, 2019.

¹² https://rajyasabha.nic.in/rsnew/rsat_work/CHAPTER—8.pdf.

¹³ Sharma, *supra* note 7.

India, no person shall be held liable for publishing any reports or discussions of the House under the authority of the member of the House.¹⁴ However, any detached part of proceedings or any publication made with malicious intention does not come under this privilege. Only the true and correct proceedings of the House come under the ambit of Article 105(2). If any such misrepresentation is detected, it would lead to breach of privilege and contempt of the House.

(ii) Right to Exclude Strangers

Only people who are Members of the House are allowed to attend and watch the proceedings of the House. Strangers i.e. people who are not members of the House can be excluded from the proceedings. This right aids in the achievement of a free and fair discussion in the House. Any breach might lead to punishment. Punishment can be in the form of imprisonment, admonition, or reprimand.¹⁵

(iii) Right to Punish Members and Outsiders for Breach of its Privileges

Strangers or any member of the House can be punished for breach of privilege or contempt of the House by the Indian Parliament. He/she is expelled from the House whenever any such breach or contempt is committed. Not just expulsion, but the House can impose the punishment of admonition, reprimand, suspension from the service of the House for the session, fine or imprisonment.¹⁶ This right has also been called as the ‘keystone of parliamentary privilege’. It is very important for the house to safeguard its authority and discharge its functions. This right enables the House to achieve these goals and protect it from contempt and breach.

(iv) Right to Regulate the Internal Affairs of the House

Each house can regulate its proceedings in any manner which it deems fit and right. No authority from the other House can interfere or indulge in the internal proceedings of a House. Each house has its own jurisdiction. Article 118 of the Constitution empowers the House to conduct its regulation for proceedings which cannot be challenged in a court of law.

“118. Rules of procedure.- (1) Each House of Parliament may make rules for regulating, subject to the provisions of this Constitution, its procedure and the conduct of its business.

(2) Until rules are made under clause (1), the rules of procedure and standing orders in force immediately before the commencement of this Constitution with respect to the Legislature of the Dominion of India shall have effect in relation to Parliament subject to such modifications and adaptations as may be made therein by the Chairman of the Council of States or the

¹⁴ INDIA CONST. art. 105(2).

¹⁵ Sharma, *Supra* note 7.

¹⁶ Hardwari Lal v. The Election Commission of India, (1977) 2 I.L.R 269.

Speaker of the House of the People, as the case may be.

(3) The President, after consultation with the Chairman of the Council of States and the Speaker of the House of the People, may make rules as to the procedure with respect to joint sittings of, and communications between, the two Houses.

(4) At a joint sitting of the two Houses the Speaker of the House of the People, or in his absence such person as may be determined by rules of procedure made under clause (3), shall preside.”¹⁷

III. SCOPE OF FREEDOM OF SPEECH AND EXPRESSION

The Indian Constitution guarantees to each and every citizen the Right to Freedom of Speech and Expression under Article 19(1)(a). This right provides the citizens with the freedom to express their views and opinions. Man, being rational, desires to do many things. In a civil society, however, his desires have to be controlled with exercising similar desires by other individuals.¹⁸ It is not an absolute right and is subject to certain reasonable restrictions.

(A) Freedom of Press

Though not expressly mentioned in Article 19, but freedom of press forms an important part of free speech and expression. The press is regarded as the fourth pillar of a healthy democracy and hence, it is the responsibility of the State to ensure that the press is able to convey true and reliable information to the public. Freedom of press is important for smooth functioning of the democratic process. Freedom of press enables the citizens to actively participate in the democratic process. It also enables free and general discussions on public matters which intelligently aids the citizens to exercise their right of making a choice.¹⁹

In the case of **Express Newspapers (Bombay) (P) Ltd. v. Union of India**, the Supreme Court said that, *“In today's free world freedom of press is the heart of social and political intercourse. The press has now assumed the role of the public educator making formal and non-formal education possible in a large scale particularly in the developing world, where television and other kinds of modern communication are not still available for all sections of society. The purpose of the press is to advance the public interest by publishing facts and opinions without which a democratic electorate cannot make responsible judgments. Newspapers being purveyors of news and views having a bearing on public administration very often carry*

¹⁷ INDIA CONST. art. 118.

¹⁸ A.K. Gopalan v. State of Madras & Anr., A.I.R. 1950 S.C. 27.

¹⁹ Dheerendra Patanjali, *Freedom of Speech and Expression India v America - A study*, INDIA LAW JOURNAL, https://www.indialawjournal.org/archives/volume3/issue_4/article_by_dheerajendra.html.

*material which would not be palatable to governments and other authorities.*²⁰

In another famous case, relating to freedom of press, of **Romesh Thappar v. State of Madras**, the Supreme Court observed that, *“freedom of speech and of the press lay at the foundation of all democratic organisations, for without free political discussion no public education, so essential for the proper functioning of the processes of popular Government, is possible.”*²¹

(B) Obscenity

Freedom of speech is not absolute in India. It is subject to certain restrictions which have been clearly laid out by the Constitution. Obscenity is one of these restrictions. Freedom of Speech and Expression guaranteed under Article 19(1) can be subjected to reasonable restrictions by the State based on public order, decency and morality. Obscenity, in the Indian context, means ‘offensive to modesty or decency; lewd, filthy and repulsive’.²² The test to determine whether a piece of work or a speech comes under the ambit of obscenity must be such so as to detect whether the publication has the tendency to corrupt the minds of people who are open to such immoral influences. The work should be read as a whole and must be examined by itself.

With respect to art and obscenity, the Supreme Court in **Samaresh Bose & Anr. v. Amal Mitra & Anr.**, observed that, *“where obscenity and art are mixed, the art must be so preponderating as to throw obscenity into a shadow or the obscenity so trivial and insignificant that it can have no effect and may be overlooked.”*²³ It was concluded that it is not possible for obscenity to have the constitutional protection of freedom of speech unless and until it achieves a preponderating social purpose or profit.

(C) Grounds of Restrictions

As has already been mentioned above, the fundamental right to Freedom of Speech and Expression under Article 19(1) of the Constitution of India is not absolute and is subject to certain reasonable restrictions. In a democratic setup, it is essential for the citizens to have the liberty to express their opinions. However, it is also important to place certain restrictions on this liberty. It will be difficult to maintain social order if the Freedom of Speech is made an absolute fundamental right.

The State can impose reasonable restrictions on the exercise of this right under Article 19(2) of the Constitution. Article 19(2) states that, *“Nothing in sub-clause (a) of clause (1) shall*

²⁰ Indian Express Newspapers (Bombay) Private Ltd. & Ors. v. Union of India & Ors., (1985) 1 S.C.C. 641.

²¹ Romesh Thappar v. State of Madras, (1950) 51 Cri. L.J. 1514.

²² Patanjali, *supra* note 18.

²³ Samaresh Bose & Anr. v. Amal Mitra & Anr., (1985) 4 S.C.C. 289.

affect the operation of any existing law, or prevent the State from making any law, in so far as such law imposes reasonable restrictions on the exercise of the right conferred by the said sub-clause in the interests of the sovereignty and integrity of India, the security of the State, friendly relations with Foreign States, public order, decency or morality or in relation to contempt of court, defamation or incitement to an offence.”²⁴

Therefore, the grounds on which restrictions on the Freedom of Speech and Expression can be imposed are as follows:-

- I. Security of State
- II. Friendly Relations with Foreign States
- III. Public Order
- IV. Decency or Morality
- V. Contempt of Court
- VI. Defamation
- VII. Incitement to an Offence
- VIII. Sovereignty and Integrity of India

IV. PARLIAMENTARY PRIVILEGES AND JUDICIAL REVIEW: A COMPARATIVE STUDY

Judicial review refers to the power of the judiciary to interpret the Constitution and declare any law enacted or order passed by the legislature or executive void, if it thinks such law or order to be unconstitutional.

Judicial review enables the judiciary to review the laws, rules and orders, of the legislature and executive, which come before them. The court determines whether these laws are in conformity with the Constitution or not. The law is upheld if it is in consonance with the Constitution, and declared invalid or void if it's unconstitutional.²⁵

(A) India

Indian judiciary has always had the power of judicial review. Parliamentary privileges in India are not immune from judicial review. The Indian judiciary has been trusted with the task of protecting the fundamental rights. It is the sole authority which acts as a saviour of the fundamental rights of the citizens. This role of the judiciary is often criticised by the

²⁴ INDIA CONST. art. 19(2).

²⁵ Ghai, *supra* note 5.

parliamentarians as they claim absolute sovereignty over their powers. They do not want the judiciary to interfere in their matters. But the judiciary, being the guardian of our Constitution has to perform its role of protecting people's fundamental and natural rights. It cannot sit quietly if any fundamental right of a citizen is violated due to privileges or when there is an escape from any criminal liability.²⁶

It is quite common for Members of Parliament to take the shelter of parliamentary privileges. It is important for the judiciary to take a stand against the wrongs committed by these members. The privileges conferred on these members are subject to fundamental rights. The Supreme Court has observed in various judgements that any conflict that may arise between the privileges and the fundamental rights must be resolved through harmonious construction.²⁷ Though the judiciary does not have any jurisdiction over parliamentary issues, still it is essential that any violation of the fundamental rights of the society should be dealt with by the Court as it deems fit.

(B) United Kingdom

In the United Kingdom, parliamentary activities are excluded from judicial oversight. This exclusion is what is known as parliamentary privilege. What it basically means is that the conduct of Parliamentary business cannot be subject to judicial challenge. Parliament enjoys absolute sovereignty and is the sole law-making authority. It is the only authority which is in charge of making the laws. Courts have minimal role to play in law-making.²⁸

Parliamentary privilege, in the United Kingdom, is a way and an aspect to show the sovereignty and supremacy of Parliament. The courts do not have the power to review a primary legislation. They cannot determine whether the legislation is fair, proportionate or constitutional. If the courts are vested with the power of making laws, then that would certainly cast a shadow on the sovereignty of the Parliament. It would mean that the courts could determine whether a law can be enforced or not, and not the Parliament.

Freedom of speech, as a parliamentary privilege, becomes an important issue in this regard. It has been enshrined in Article 9 of the Bill of Rights 1689. It says "*That the freedom of speech and debates or proceedings in Parliament ought not to be impeached or questioned in any court or place out of Parliament.*"²⁹ This privilege is of paramount importance as it ensures

²⁶ Sharma, *supra* note 7.

²⁷ Power, Privileges & Immunities of State Legislatures, Re v., (1965) 1 S.C.R. 413.

²⁸ Dominic Grieve, *Parliament and the judiciary*, GOV.UK (Oct. 25, 2012), <https://www.gov.uk/government/speeches/parliament-and-the-judiciary>.

²⁹ Art. 9, English Bill of Rights (Dec. 16, 1689).

that Parliament is independent of the judiciary and that any person who is contributing towards the functioning of the parliament, is able to voice his opinions without any kind of fear.

The Parliament and the courts have displayed a long-standing comity among themselves. Parliament usually ensures that it does not bring up matters in debates, motions or questions which are awaiting adjudication in the Courts. On the other hand, the courts also make sure that they do not interfere in the law-making process. Each of these organs makes sure that it does not intrude into the other's territory.

V. IS PARLIAMENTARY SOVEREIGNTY IMMUNE FROM JUDICIAL REVIEW?

Parliamentary Sovereignty means the supremacy of the Parliament in making laws. In India, parliamentary sovereignty and judicial review remain at loggerheads. Parliament wants absolute sovereignty when it comes to enactment of laws and passing of orders. Also, the judiciary wants absolute freedom with its power to interpret these laws and declare any law unconstitutional if it deems fit.

On one hand Parliament claims absolute sovereignty in parliamentary matters. It wants itself to be the sole decision and law-making body in the country. It does not want judiciary to interfere in its working. On the other hand, judiciary is the custodian of Indian Constitution and the fundamental rights enshrined in it. It is the duty of the judiciary to see that no unconstitutional law is passed. Therefore, it does not admit any restraint on its power of judicial review.³⁰

Hence, in India, parliamentary sovereignty is not immune from judicial review. Judiciary has the power to declare any law passed by the legislature or the executive void, if it is not in conformity with the Constitution.

In the United Kingdom, however, the situation is a bit different. The British Parliament's laws are not immune from judicial review but they can't be blocked or changed unless Parliament approves. The laws made by the British Parliament can be reviewed by the courts but cannot out rightly be declared invalid or void. The parliament is the sole law-making body and enjoys absolute sovereignty. It is for the Parliament to decide whether a law is unconstitutional or not.

Hence, in the United Kingdom, parliamentary sovereignty is not immune from judicial review. But, the courts cannot be involved in the law-making process and can only give its opinion with respect to a certain law or order. Whether that opinion is to be taken into consideration is the sole discretion of the Parliament.

³⁰ <https://iasscore.in/national-issues/Judicial-Review-of-Parliamentary-Privileges>.

VI. CONCLUSION

Parliamentary privileges are an important and essential part of Indian democracy. These privileges are provided to the Members so that they ensure smooth functioning of the parliament. It is important for these privileges to be in conformity with the fundamental rights enshrined in the Constitution. Fundamental rights are basic natural rights and the parliamentarians, being our representatives, have to ensure that they are not violated and have to work for our welfare. If the privileges are not in accordance with the fundamental rights then the very essence of democracy for the protection of the rights of the citizen will be lost.³¹

Right to Freedom of Speech is one of the most important parliamentary privileges and fundamental rights. It includes circulating one's views by words or in writing or through audio-visual instrumentalities, through advertisements and through any other communication channel. It also comprises of right to information, freedom of press etc. Thus this fundamental right has a vast scope.³²

³¹ Sharma, *supra* note 7.

³² *Freedom of Speech and Expression*, LAW TEACHER (Feb. 2, 2018), <https://www.lawteacher.net/free-law-essays/constitutional-law/freedom-of-speech-and-expression-constitutional-law-essay.php>.

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