IN THE SUPREME COURT OF INDIA

CIVIL ORIGINAL JURISDICTION

WRIT PETITION (CIVIL) NO. 1361 OF 2026

IN THE MATTER OF:

NETWORK OF WOMEN IN MEDIA, INDIA ...Petitioner

VERSUS

UNION OF INDIA & ORS. ...Respondents

WITH

WRIT PETITION (CIVIL) NO. 1364 OF 2026

(FREE SPEECH COLLECTIVE v. UNION OF INDIA & ORS.)

AND

WRIT PETITION (CIVIL) NO. 1366 OF 2026

(DELHI UNION OF JOURNALISTS & ANR. v. UNION OF INDIA & ORS.)

AND

WRIT PETITION (CIVIL) NO. 1373 OF 2026

(KERALA UNION OF WORKING JOURNALISTS [KUWJ], DELHI UNIT v. UNION OF INDIA)

COUNTER AFFIDAVIT ON BEHALF OF RESPONDENT NO. 3 – COMMISSIONER OF POLICE, DELHI

PAPER BOOK
(FOR INDEX KINDLY SEE INSIDE)

ADVOCATE FOR THE RESPONDENT NO.3: S N TERDAL

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Filed By:- S.N.TERDAL
(AOR FOR RESPONDENT)

Filed on:-16.11.2026.

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COUNTER AFFIDAVIT ON BEHALF OF RESPONDENT NO. 3 – COMMISSIONER OF POLICE, DELHI

I, Surender Kumar, by designation IPS, currently serving as Joint Commissioner of Police, Crime, Delhi, aged about 44 years, presently working as Joint Commissioner of Police, Headquarters, Delhi Police, having my office at Police Headquarters, Jai Singh Marg, New Delhi – 110001, being duly authorised for the purpose and being well acquainted with the facts and records of the present case, do hereby solemnly affirm and state as under:

1. I am presently working as Joint Commissioner of Police, Headquarters, PHQ, New Delhi and am well acquainted with the facts and circumstances of the present case on the basis of the official records maintained by the Delhi Police.

2. I am competent and duly authorised to depose by way of the present Counter Affidavit on behalf of the Delhi Police, namely Respondent No. 3, the Commissioner of Police, Delhi (hereinafter referred to as "**the Answering Respondent**" or "**the Delhi Police**").

3. I have read and understood the contents of the instant Writ Petition, as also of the connected Writ Petitions bearing W.P.(C) No. 1364 of 2026 and W.P.(C) No. 1366 of 2026 and W.P.(C) No. 1373 of 2026. Save and except what is specifically and expressly admitted hereinafter, all the averments, allegations and submissions contained therein are denied.

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PRELIMINARY SUBMISSIONS

4. It is submitted that the instant Writ Petition has been grouped, together with W.P.(C) No. 1364 of 2026 filed by the Free-Speech Collective and W.P.(C) No. 1366 of 2026 filed by the Delhi Union of Journalists, as **"Petitions qua Journalists" (Category 1.4)**. It is respectfully submitted that since the facts, grounds and reliefs in the said Petition(s) substantially overlap, and the Petition filed by the Free-Speech Collective is, in its synopsis, grounds and prayers, almost verbatim identical to the instant Petition, the present Counter Affidavit may kindly be read as the comprehensive Reply of the Answering Respondent in respect of all the three Petition(s).

5. At the very outset, it is submitted that the Answering Respondent holds the freedom of the press in the highest regard and remains firmly committed to respecting and safeguarding the rights of professional journalists to gather, record and disseminate information, which constitute an integral facet of the freedom of speech and expression guaranteed under Article 19(1)(a) of the Constitution of India. It is categorically submitted that the Delhi Police has, at no point, sought to obstruct, impede or interfere with the bona fide discharge of journalistic duties, whether during the protests in question or otherwise.

6. It is further respectfully submitted that the direction contained in paragraph 16(f) of the Order dated 11.10.2026 passed in Contempt Petition (C) Diary No. 63801 of 2026 (Annexure P-14 to the instant Petition, @ page 113), on which the Petitioners have founded their

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case, was recorded by this Hon'ble Court upon taking note of the assurance given by the learned Solicitor General of India on behalf of the authorities, and reads as under:

> ***"(f) Lawyers, journalists and other professionals shall not be hindered in discharge of their professional duties in any manner whatsoever."***

7. The Answering Respondent has, at all times, remained conscious of and abided by the said assurance. It is, however, respectfully submitted that the said direction protects journalists in the discharge of their professional duties and does not, and was not intended to, exempt the so-called reel-makers and social media influencers or unruly elements from the operation of the general law or from compliance with the lawful directions of the Law Enforcement Agencies at the site of a prohibited assembly.

8. It is submitted that despite the presence of a large number of unauthorised protestors, journalists from all mainstream, National, International, Regional, Accredited and even unaccredited freely recorded the events of the protests as well as of members of the public. In this regard, several videos have surfaced on various social media platforms, and media posts published by Brut India, The Lallantop, Jist, The Quint, BBC, The Indian Express, Bharattgenz and others are available online.

9. The data collated by the Delhi Police from the CCTV footage, and police videography of the protest sites further bears out the extent of media presence and coverage. The photographs and videos of the

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protests were, in fact, widely published and broadcast by international, national and regional media houses alike, which by itself belies the allegation that the press was prevented from witnessing and reporting the events.

10. It is most respectfully submitted that no obstruction or hindrance was caused to the lawful reporting of events from the various locations. The events in question were extensively covered on various social media platforms as well as by independent journalists through their respective channels. It is, however, respectfully submitted that, in the unlikely event of any instance of confusion or interference having occurred, the same was purely inadvertent and bona fide, either on account of a mistaken identity or in the course of bona fide crowd control measures necessitated by the prevailing situation.

11. It is submitted that at no point was there any deliberate or concerted action on the part of the Delhi Police to obstruct, restrict or interfere with journalists who were lawfully discharging their professional duties. It is further submitted that wherever any individual was apprehended on account of a mistaken identity, such individual was immediately released upon verification and ascertainment of their actual identity.

12. It is submitted that the Delhi Police fully respects the role of the press, it is however submitted that some of the protestors who participated in the illegal protest were not journalists, but were using a camera and a microphone, falsely claiming to be journalists. There

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were many "content creators" for YouTube reels with a camera and a microphone making it difficult to distinguish between journalists and reel makers. It is, however submitted that even such reel makers were not obstructed or hindered except in cases where maintenance of public order and law and order so required.

13. The videos circulated on social media during the protests themselves bear this out. In one such video, a person holding a press card and a microphone identification, who described herself as a student as well as a journalist, openly stated on camera that she was present in support of the protest ("*Hum protest ke saath hain isiliye yahan par hain*"), and, upon being questioned, conceded that she was "not a journalist yet" but nonetheless held a press card ("Press card toh hai na") (video available at https://www.instagram.com/reel/DeJuRMpiqqf/). In another video, a person present at the site observed that certain persons who had come as YouTubers and media persons were deliberately confronting police personnel in their pursuit of content, and that the police was, in fact, assisting the media and not detaining them ("*Filhaal, media ko abhi police help kar rahi hai, detain nahi kar rahi hai. Lekin kuch yahan log hain jo YouTuber ke roop mein aaye hain lekin jaanbujh ke media bana ke abhi yeh log police se bhid rahe hain*") (video available at https://www.instagram.com/reel/DeUCObOztnp/).

14. Further, in another video circulated on social media, certain individuals identifying themselves as "media personnel" are seen

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participating in the raising of slogans along with the protestors, clearly suggesting that they are not journalists. That such conduct indicates that some of these individuals were participating in the protest and were not at the spot in their capacity as journalists.

15. It is further respectfully submitted that, during the course of the protest, repeated announcements were made by the police authorities through loudhailers and public address systems, requesting all persons present not to obstruct or impede police personnel in the discharge of their lawful duties. Despite such repeated directions, a few people were observed moving into the midst of the crowd and coming in close proximity to the areas where police operations were underway, thereby, at times, interfering with the ongoing crowd-management and law-enforcement measures.

16. On several occasions, such persons carrying cameras were requested to maintain a reasonable distance from the operational areas and to refrain from coming in the immediate vicinity of the area where authorities were engaged in maintaining law and order. However, some continued to remain in close proximity while recording the proceedings. It is respectfully submitted that, having regard to the sheer magnitude and density of the gathering, the prevailing circumstances and the rapidly evolving situation, it was not always possible for the police personnel on the ground to immediately distinguish media personnel from protestors, particularly where individuals were moving within the crowd and in the immediate vicinity of police operations. In this regard, it is categorically

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submitted that the police action was directed solely towards dispersing and removing the protestors from the illegal protest sites and restoring public order, and was neither intended nor directed towards detaining, restraining or obstructing any media personnel in the lawful discharge of their professional duties. The police personnel were acting in the discharge of their statutory obligations and were guided by the paramount consideration of maintaining and balancing public order and ensuring effective crowd management. In support of the aforesaid submissions, two video recordings depicting the relevant circumstances are available at the following links: (i) https://www.instagram.com/reel/DeWMH2Pz3cs/ (ii) https://www.instagram.com/reel/DeUWGJsPTup/

17. In light of the foregoing submissions, it is respectfully submitted that the Answering Respondent has not placed any restriction on the right of any citizen to report or disseminate information, nor has any person been proceeded against on the ground of lacking press accreditation or an identity card. The only restrictions in operation at the protest sites were those arising from the applicable prohibitory orders and lawful directions issued by the police in the interest of maintaining public order, a constitutionally recognised ground for imposing reasonable restrictions under Article 19(2) of the Constitution of India. Such restrictions were uniformly applicable to all persons present at the site, irrespective of whether they identified themselves as journalists or otherwise.

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THE GUIDELINES GOVERNING JOURNALISTS COVERING PROTESTS

(a) The statutory definition of a journalist and the accreditation framework

18. It is submitted that, in the digital era through which the country and the world are presently passing, it is necessary to point out that the term "working journalist" has a distinct and specific connotation. Journalists are the flag-bearers of any democracy, and their rights must be respected and protected.

19. The term "working journalist" is defined under Section 2(1)(zzm) of the Occupational Safety, Health and Working Conditions Code, 2020, which reads as under:

> *2(1)(zzm) "Working Journalist" means a person whose principal avocation is that of a journalist and who is employed as such, either whole-time or part-time, in, or in relation to, one or more newspaper establishment, or other establishment relating to any electronic media or digital media such as newspaper or radio or other like media and includes an editor, a leader-writer, news editor, sub-editor, feature-writer, copy- tester, reporter, correspondent, cartoonist, news-photographer and proof-reader, but does*

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not include any such person who is employed mainly in a managerial, supervisory or administrative capacity.

20. The other definitions, namely, "ordinarily employed" under Section 2(1)(zv) and "producer" under Section 2(1)(zza) of Occupational Safety, Health and Working Conditions Code, 2020, are also relevant and are reproduced hereunder:

> *2(1) (zv): "ordinarily employed" with reference to any establishment or part thereof, means the average number of persons employed per day in the establishment or part thereof during the preceding calendar year obtained by dividing the number of man days worked by the number of working days excluding rest days and other non-working days;*
>
> *2(1)(zza): "producer", in relation to audio-visual production, means the company, firm or other person by whom the arrangements necessary for producing such audio-visual (including the raising of finances and engaging audio-visual workers for producing audio-visual) are undertaken.*

21. It is submitted that, in the present era of evolving digital media, several individuals, whether creative or otherwise, make reels, upload them and commercially exploit the content created by them. While there can be no objection to such activities, the question as to

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whether such reel-makers can be elevated to the status of journalists or reporters is yet to be determined.

22. It is for this reason that guidelines have been laid down for the accreditation of journalists, which perhaps constitute the only distinguishing factor between journalists and reporters, on the one hand, and reel-makers, on the other. At the cost of repetition, it is emphasised that it is not the intention of the answering respondent to obstruct reel-makers or content creators from pursuing their activities. This aspect is placed before this Hon'ble Court only to highlight the distinction between the two categories and the practical difficulties that the police establishment may face on the ground when confronted with an unprecedented situation in which it is tasked with controlling an unauthorised protest proceeding towards the Parliament of the country.

23. The **Central Media Accreditation Guidelines, 2022**, issued by the Press Information Bureau, similarly adopt this definition under Clause 4.7. It is evident from the aforesaid definition that the professional status of a working journalist is founded upon objective criteria, namely, that journalism constitutes the person's principal avocation and that the person is employed in, or in relation to, a recognised news establishment.

24. It is submitted that the requirement that journalists carry an identity card issued by their employer or an accreditation card issued by the Press Information Bureau (PIB) or the Directorate of Information and Publicity (DIP), as contemplated by the advisory dated

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05.10.2026 issued by the Answering Respondent, was intended to facilitate the verification of such professional credentials at the protest sites.

A true copy of the Guidelines for Journalists issued by the Delhi Police on 05.10.2026 through its official social media handles is annexed herewith and marked as **ANNEXURE A-1**.

25. It is respectfully submitted that Clause 6 of the Central Media Accreditation Guidelines, 2022 of the Press Information Bureau, Government of India, provide for the grant of accreditation, after police verification and with the concurrence of the Ministry of Home Affairs, to working journalists, freelance journalists, camerapersons and technicians, and, in terms similar to Rule 6.3 of the earlier Central News Media Accreditation Guidelines, 1999, provide that accreditation shall not confer any official or special status on news media representatives *"but shall only recognise their identity as a professional working journalist"*.

26. Clause 6.8 of the said Guidelines further provides that the accreditation granted to a journalist is liable to be suspended or withdrawn, *inter alia*, where the journalist "*acts in a manner which is prejudicial to 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"* (Clause 6.8(h)), or where the journalist or the news media organisation concerned is found to have furnished false, fraudulent or forged information or documents, in which event

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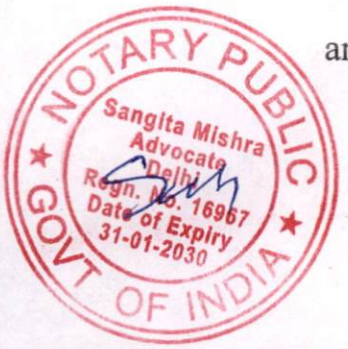
the working journalist or media organisation is debarred from accreditation for a period of not less than two years and up to a maximum of five years, as may be decided by the Central Media Accreditation Committee (Clause 6.8(c)). The accreditation framework thus itself recognises that the professional status it confers is conditional upon the journalist acting in a manner consistent with public order.

27. The advisory dated 05.10.2026 issued by the Delhi Police, permitting access to media personnel holding Press Information Bureau (hereinafter "**PIB**") accreditation or other recognised forms of identification, was in conformity with the prevailing PIB norms.

28. Similar practices are followed in respect of accredited journalists and media houses, whether in print, television or digital media, at numerous events conducted across the country. The object of such a measure is to ensure that bona fide media persons are granted access, while individuals posing as journalists for extraneous purposes are prevented from entering designated media access zones and restricted areas.

29. It is further submitted that no prejudice is caused by temporarily restricting the access of persons whose credentials are found to be doubtful or unverifiable, pending verification of such credentials through the prescribed process.

A true copy of the Central Media Accreditation Guidelines, 2022 issued by the Press Information Bureau, Government of India is annexed herewith and marked as **ANNEXURE A-2.**



30. The said aspect may further be appreciated from a video circulated on the social media platform X, available at https://x.com/OpIndia_com/status/2108182905206046813, which demonstrates that an entity named the "Indian Press Union", purportedly registered as an MSME and not shown to be recognised by any statutory accreditation authority, is allegedly issuing digital press identity cards for a consideration of ₹1,000/-.

31. It is submitted that the said video further suggests the ease with which such identity cards may be obtained from private organisations without any substantial verification of journalistic credentials, and are thereafter used to gain access to events, public gatherings, arrangements and protest sites.

32. The aforesaid instance highlights the limitations of privately issued press cards and underscores the necessity of accreditation by recognised authorities such as the Press Information Bureau (PIB) and the Directorate of Information & Public Relations (DIP), which serve as an important mechanism for distinguishing bona fide journalists from unauthorised persons seeking access under the guise of media activity.

A true copy of the transcript, with its English translation, along with screenshots of a video showing that an entity named the "Indian Press Union", not recognised by any statutory accreditation authority, issues digital press identity cards to persons for a consideration of ₹1,000/- without any verification of journalistic

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credentials, is being annexed herewith and marked as **ANNEXURE A-3**.

(b) The Guidelines for Journalists issued by the Delhi Police

33. It is submitted that, while reiterating that journalism undertaken by journalists and reporters is a salutary function in any democracy, the following regulatory framework is referred to only for the limited purpose of demonstrating that journalists and reporters constitute a distinct class from other persons who carry cameras and microphones, not for the purpose of reporting through print, electronic or digital media, but for other purposes, including commercial exploitation of content.

34. It is submitted that this Hon'ble Court may examine the distinction between the journalistic duty of reporting facts, as witnessed on the ground, neutrally and without fear or favour, and the act of recording events merely for content creation and subsequent monetisation. The predominant intent behind the activity may be the decisive factor.

35. The following guidelines are, therefore, placed before this Hon'ble Court only to demonstrate this distinction and not to undermine the importance of journalism or the role of journalists and reporters as the fourth pillar of democracy.

36. On 05.10.2026, the Delhi Police issued "Guidelines for Journalists" through various social media platforms, including Facebook, Instagram, X and Telegram, for their wider dissemination among media personnel and the general public. The said guidelines

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specifically highlighted, *inter alia*, that journalists must carry valid identity cards, display them visibly at all times, refrain from obstructing police operations, and maintain a responsible and safe distance.

37. The complete text of the said advisory, reads as under:

> *"All journalists assigned to cover protests are advised to CARRY VALID IDENTITY CARDS issued by their respective organisations and/or valid PIB/DIP accreditation cards. They should keep their identification cards VISIBLY DISPLAYED AT ALL TIMES to facilitate identification by law enforcement agencies present at the site. They should also ensure that their presence or activities DO NOT OBSTRUCT POLICE OPERATIONS or the movement of law enforcement personnel. During tense situations, journalists present at the site should MAINTAIN A REASONABLE AND SAFE DISTANCE while covering and recording the proceedings. They should position themselves in a manner that clearly distinguishes them from protestors."*

38. It is submitted that the advisory, in clear and unambiguous terms, prescribes the following measures for journalists covering protests: (i) carrying a valid identity card issued by their respective organisation and/or a valid accreditation card issued by the PIB/DIP (ii) keeping such identification prominently displayed at all times to enable prompt identification by the law enforcement personnel

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deployed at the site (iii) ensuring that their presence and professional activities do not impede police operations or obstruct the movement of law enforcement personnel; and (iv) maintaining a reasonable and safe distance during tense situations and positioning themselves in a manner that distinguishes them from the protestors.

39. The said measures are purely facilitative and precautionary in nature, intended to enable the police to readily identify bona fide journalists and ensure their safety while discharging their professional duties. They neither curtail nor place any restriction on the right of any person to gather, record or disseminate information. The Delhi Police, through the said advisory, sought to facilitate lawful reporting by citizens and media persons alike, and remains conscious that any action such as the unlawful removal of journalists or the confiscation of their equipment would be contrary to, and violative of, their constitutional rights, including the right to freedom of speech and expression guaranteed under Article 19(1)(a) of the Constitution of India.

40. The advisory dated 05.10.2026 was issued with the sole objective of facilitating the unhindered discharge of journalistic duties while ensuring the safety of journalists at the protest sites. That recognising that not all journalists may possess PIB accreditation, the advisory expressly provided for an identity card issued by their respective employer as an alternative and equally acceptable means of identification. The Delhi Police thus consciously adopted an inclusive approach, ensuring that the absence of formal PIB

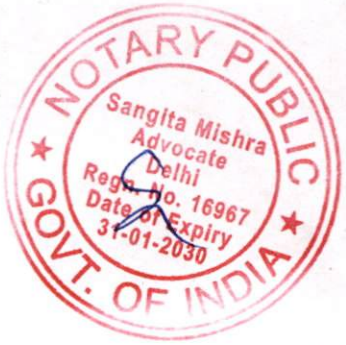
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accreditation did not, by itself, preclude journalists from being identified and facilitated in the discharge of their professional duties, particularly in situations involving heightened tension and potential law-and-order concerns.

41. It is further submitted that the constitutional freedom to undertake lawful news gathering, recording and publication, as exercised by independent media persons, journalists, freelancers, citizens, reporters and individuals reporting through YouTube or other digital platforms, cannot be denied solely on the ground that they do not possess PIB accreditation, an employer-issued press card, or employment with a recognised news organisation. The advisory dated 05.10.2026 did not seek to do so; it was intended only to facilitate identification at the site, and the exercise of such freedom remains subject, as in the case of every citizen, to the general law and to the lawful directions of the police.

(c) The Guidelines issued by the Press Council of India

42. It is submitted that on 15.10.2026, the Press Council of India issued Guidelines for Journalists Covering Protests and Demonstrations, whereby the press has been advised to follow the guidelines set out therein under the following heads, namely: (i) Identification and Professional Conduct; (ii) Positioning and Crowd Safety; (iii) Situational Awareness and Escape Planning; (iv) Personal



Protective Measures and First Aid; (v) Coordination and Communication; and (vi) Ethical and Responsible Reporting.

A true copy of the Press Release No. PR/S/26-27-PCI dated 15.10.2026 issued by the Press Council of India, containing the Guidelines for Journalists Covering Protests and Demonstrations, is annexed herewith and marked as **ANNEXURE A-4.**

43. It is pertinent to note that the Press Council of India is the statutory body constituted under the **Press Council Act, 1978** to preserve the freedom of the press, one of whose functions under **Section 13(2)(b)** of the said Act is "to build up a code of conduct for newspapers, news agencies and journalists in accordance with high professional standards".

44. The guidelines so issued advise journalists, *inter alia*, to carry a valid identity card issued by their media organisation and/or valid PIB/DIP accreditation and to keep it visibly displayed at all times, to clearly identify themselves as journalists when approached by law enforcement personnel; to maintain neutrality and not to participate in demonstrations, take sides, provoke confrontations or interfere with protestors or the police, to follow police orders and comply with lawful instructions, particularly those issued for immediate safety reasons, to maintain a reasonable and safe distance from confrontations, and to coordinate with designated police officers for media staging areas in the case of planned demonstrations.



45. The guidelines of the press' own statutory body are thus, in substance identical to the advisory issued by the Delhi Police, which conclusively demonstrates that the advisory was a reasonable, bona fide and widely accepted measure of safety and identification, and not an attempt to license or restrict the press.

46. The measures undertaken by the Delhi Police during the protests were necessitated by considerations of law and order and public safety within the New Delhi District, which houses Parliament, this Hon'ble Court, various Central Ministries and several foreign missions. These circumstances assumed particular significance in view of the prohibitory orders imposed under Section 163 of the Bharatiya Nagarik Suraksha Sanhita, 2023, which were in force at the relevant time. Notwithstanding the said orders, there were repeated attempts by groups of protestors to breach police barricades and enter restricted areas. In this regard, criminal cases were registered at Police Station Parliament Street, *inter alia*, in relation to the obstruction of, assault upon and causing of hurt to public servants while discharging their official duties, including FIR Nos. 108/2026 and 128/2026.

47. It is submitted that throughout the said period, the Delhi Police exercised the utmost restraint and resorted only to the minimum force necessary to disperse the prohibited assemblies and to secure compliance with its lawful directions, and the persons so removed from the protest sites were released.

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48. It is respectfully submitted that the law expressly recognises the authority of the police to issue lawful directions in the discharge of their duties and to secure compliance with the same. Section 172(1) of the Bharatiya Nagarik Suraksha Sanhita, 2023 mandates that all persons shall be bound to conform to the lawful directions of a police officer given in fulfilment of any duty under Chapter XII thereof. Section 172(2) further empowers a police officer to remove any person resisting, refusing, ignoring or disregarding any such direction, and either take such person before a Magistrate or, in petty cases, release such person as soon as possible within a period of twenty-four hours. Further, Section 65 of the Delhi Police Act, 1978 requires all persons to comply with the reasonable directions issued by a police officer in the discharge of duties under the said Act, and empowers the police to remove a person who resists, refuses or fails to comply with such directions, subject to the safeguards prescribed therein. Further, Section 29 of the Delhi Police Act, 1978 expressly empowers the Commissioner of Police and, subject to his orders, police officers not below the rank of Inspector, to issue directions governing the conduct of persons constituting assemblies and processions, regulating their routes and timings, preventing obstruction and maintaining order in public places.

49. This Hon'ble Court has consistently held that the right of assembly, though fundamental, is subject to reasonable regulation. In **Himat Lal K. Shah v. Commissioner of Police**, ***(1973) 1 SCC 227***, the right to hold meetings on public streets was held to be "subject to the control of the appropriate authority".

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50. Further, **In re: Ramlila Maidan Incident**, ***(2012) 5 SCC 1***, this Hon'ble Court held that the said freedom "is not absolute and is subject to regulatory measures", and that there is "a fundamental duty upon the citizens to obey such lawful orders". That further, in **Mazdoor Kisan Shakti Sangathan v. Union of India** ***(W.P.(C) No. 1153 of 2017, decided on 23.07.2018)***, concerning protests at Jantar Mantar itself, the rights of protestors were held to be "not untrammeled and unlimited in their scope". That in **Amit Sahni v. Commissioner of Police**, ***(2020) 10 SCC 439***, it was noted that "the demonstrations expressing dissent have to be in designated places alone".

51. The constitutional validity of Section 144 of the Code of Criminal Procedure, 1973, the *pari materia* predecessor of Section 163 of the Bharatiya Nagarik Suraksha Sanhita, 2023, stands upheld in **Babulal Parate v. State of Maharashtra**, ***(1961) 3 SCR 423*** and **Madhu Limaye v. Sub-Divisional Magistrate, Monghyr**, ***(1970) 3 SCC 746***, as noticed by this Hon'ble Court in its Order dated 15.10.2026 in W.P.(C) No. 1335 of 2026.

52. In order to ensure the dignity, bodily integrity and safety of women journalists during the CJP protest, the Delhi Police deployed an adequate number of women police personnel, including women personnel from the Central Armed Police Forces, during both the day and night shifts. A total of 3,747 women personnel were deployed during the day shift and 664 women personnel during the night shift. It is pertinent to mention that, during the CJP protest, no

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woman removed was conveyed to any designated facility in a police vehicle without the presence of a woman police officer accompanying her in the said vehicle.

53. It is submitted that the aforesaid position holds true not only in respect of women journalists but also in respect of women protesters.

54. It is submitted that, with regard to the allegations of manhandling of women journalists, it is respectfully submitted that the requirement of women personnel handling women is not a statutory mandate in the context of crowd-control operations, in the same manner as it is expressly prescribed under the Bharatiya Nagarik Suraksha Sanhita, 2023 in relation to searches and arrests. That in the context of crowd control, the deployment of women personnel to handle women participants is ordinarily an operational consideration, adopted having regard to the circumstances prevailing at the site, including the need to maintain propriety, avoid unnecessary confrontation and defuse tensions, particularly during protests involving women participants. Accordingly, the mere presence or involvement of male police personnel in crowd-control operations during the CJP protest cannot, in itself, be construed as misconduct, particularly where the circumstances warrant immediate police intervention by the nearest police personnel. That further, there is no legal bar on a male police officer acting as the first responder or assisting a woman police officer in the discharge of her duties if the circumstances on the

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ground so require, as such decisions are to be taken in a fraction of a second.

55. It is submitted that in this context, it is submitted that the safeguards contained in the proviso to Section 43(1), Section 43(5) and Section 49(2) of the Bharatiya Nagarik Suraksha Sanhita, 2023, which respectively regulate the touching of a woman for the purpose of her arrest, prohibit the arrest of a woman after sunset and before sunrise, save in exceptional circumstances, and require the search of a woman to be made only by another woman with strict regard to decency, apply to arrests and searches, and the Delhi Police scrupulously abides by the same.

56. It is further submitted that there was no mala fide on the part of the police. Some journalists were mistakenly identified as protestors in the absence of conspicuously displayed identification/accreditation. That however, the moment the journalistic credentials of any person were ascertained, such person was immediately released.

57. It is respectfully submitted that any removal of a journalist was inadvertent and unintentional, based on mistaken identity or bona fide error, and not on account of any mala fide. It is also pertinent to mention that, during active crowd control, police personnel themselves were subjected to harassment and assault while on duty.

58. It is respectfully submitted that, as directed by this Hon'ble Court vide Order dated 15.10.2026 in W.P. (C) No. 1333 of 2026, the CCTV footage and other relevant footage pertaining to the incidents is being appropriately preserved, both at the level of the primary

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source, namely the Police Stations of local jurisdiction, and at the Legal Division, Police Headquarters, so as to maintain the sanctity of the digital evidence. An order has also been issued by the Office of the Commissioner of Police, Delhi to all Districts and Units for strict compliance and preservation of evidence.

59. It is further respectfully submitted that this Hon'ble Court, vide Order dated 18.08.2026 passed in W.P. (Crl.) No. 280 of 2026 and connected matters, has already issued specific directions to the police authorities to preserve CCTV footage, drone footage, body-worn camera recordings, videographic records, wireless communication records and PCR call logs pertaining to the earlier protests, and to furnish the same to the High-Powered Enquiry Committee.

60. Furthermore, the Delhi Police is independently bound by the directions laid down by this Hon'ble Court in **Paramvir Singh Saini v. Baljit Singh**, ***(2021) 1 SCC 184***, concerning the installation of CCTV cameras in police stations and the preservation of the recorded footage. In view of the aforesaid judicial directions, read in conjunction with the measures and safeguards detailed in the preceding paragraph, adequate mechanisms are already in place to ensure the preservation of relevant material and evidence. That therefore, the apprehension expressed by the Petitioners regarding



the possible loss or destruction of evidence is devoid of any substantial basis.

RESPONSE TO SPECIFIC INCIDENTS

61. It is respectfully submitted that none of the Petitioners claim any personal knowledge of the incidents alleged in the petitions, which are founded entirely upon newspaper reports, web articles, posts on the social media intermediaries like X, Instagram, Facebook, etc, and screenshots of videos and unsworn statements.

62. Further, the Petitioner in W.P.(C) No. 1364 of 2026 relies upon the posts annexed by it "subject to verification of the particular acts depicted against the accompanying recordings and the Respondents' records" (paragraph 24, @ page 17) and states that the circumstances of each removal "remain matters requiring verification from the police records" (paragraph 35, @ page 24); and the petitioner in W.P.(C) No. 1366 of 2026 states that "Allegations reported by third parties are pleaded as such and require examination against original recordings and official records" (paragraph 5, @ page 3).

63. It is submitted that the alleged non-compliance with paragraph 16(f) of the Order dated 11.10.2026, which forms the substratum of the present petitions, is already the subject matter of Contempt Petition (C) Diary No. 64174 of 2026 filed by the Free Speech Collective, the petitioner in the connected W.P.(C) No. 1364 of 2026, and of Contempt Petition (C) Diary No. 64371 of 2026 filed by Mr. Ryan

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Thomas, both of which are tagged with Contempt Petition (C) No. 844 of 2026. The Free-Speech Collective (Writ Petition (Civil) No. 1364 of 2026) is thus pursuing the very same grievance in two parallel proceedings before this Hon'ble Court. It is further pertinent to note that the said petitioner has expressly declared that "no representation has been made before the concerned authority" *(Declaration (b), @ page 35 of W.P.(C) No. 1364 of 2026)*.

(a) Complaints made by women journalists on 03.10.2026

64. On 03.10.2026, three women journalists who were covering the demonstrations in the vicinity of Jantar Mantar made complaints alleging sexual harassment by Delhi Police personnel in the course of the discharge of their professional duties. The Delhi Police subsequently acknowledged the receipt of the said complaints and, with a view to ensuring an enquiry on merits, referred the same to the Crime Branch, which is a separate unit not dealing with the crowd control operations. It is submitted that this was done for neutral investigation. The said allegations arose in the course of the crowd control measures undertaken for the maintenance of law and order during the demonstrations, and pertain to the alleged conduct of police personnel towards journalists engaged in reporting.

65. It is respectfully submitted that, as per the report received from the competent officer of the New Delhi District dated 24.10.2026, a total of four complaints were received at Police Station Parliament Street in connection with the aforesaid protest, which were thereafter

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transferred to the Crime Branch for necessary enquiry. It is submitted that the report furnished by the Crime Branch further confirms that four complaints made by women journalists pertaining to allegations of harassment were received through Police Station Parliament Street. The enquiry into all four complaints has since been concluded, as set out hereunder.

66. It is submitted that insofar as three of the said complaints are concerned, two of the complainants joined the enquiry and stated that they did not wish to pursue their respective complaints or to seek any further police action. The third complainant did not join the enquiry despite service of notices and attempts to contact her telephonically; subsequently, the said complainant and her advocate informed that she was not willing to pursue her complaint.

67. Further in the course of the said enquiry, the relevant CCTV footage and video recordings provided by Head Assistant Administration and the Photo Section, New Delhi District, pertaining to the protest and the removal proceedings on 03.10.2026, were examined. No footage depicting the specific acts of sexual harassment alleged in the complaints was found. The video recordings, however, show that two of the said complainants were removed by a lady police officer. Thus, on the basis of the material presently available, the specific allegations could not be corroborated. Accordingly, the said three complaints have been filed and the matter stands closed.

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68. It is submitted that, insofar as the fourth complaint is concerned, a thorough enquiry was conducted, in which all the relevant CCTV footage and video recordings, as well as the witnesses present at the place of the incident, were independently examined to ascertain whether a prima facie case was made out. Upon such examination, no prima facie case was found warranting further proceedings in the matter, including the registration of an FIR. On the material presently available, the specific allegations could not be corroborated, and all the allegations levelled in the complaint stood negated. The complaint has, therefore, been filed in accordance with law.

69. It is further submitted that the said complainant has preferred an application under Section 175(3) of the Bharatiya Nagarik Suraksha Sanhita, 2023 before the Ld. Judicial Magistrate First Class-06, Patiala House Courts, New Delhi, being ***Ct. Cases No. 1593/2026 (CNR No. DLND02-110221-2026***). By Order dated 03.11.2026, the Ld. Court has called for an action taken report from the SHO, Police Station Parliament Street, and has directed the preservation of the CCTV footage and other digital evidence, including body camera footage, pertaining to the place of the incident. The matter is next listed on 01.12.2026, and the action taken report shall be filed before the Ld. Court in accordance with law.

70. It is further submitted that FIR No. 129/2026 dated 13.10.2026 under Sections 221, 356(2) and 3(5) of the Bharatiya Nyaya Sanhita, 2023 and Sections 3(1)(p), 3(1)(q), 3(1)(r) and 3(1)(s) of the

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Scheduled Castes and the Scheduled Tribes (Prevention of Atrocities) Act, 1989 was registered at Police Station Parliament Street against a woman journalist, and the same has been transferred to the Crime Branch, Delhi for further investigation vide R/C No. 316/21/26 dated 22.10.2026.

71. It is submitted that, in compliance with the Order dated 15.10.2026 passed by this Hon'ble Court, no coercive action has been taken against the said journalist.

72. It is submitted that, since the aforesaid FIR and the investigation pursuant thereto are the subject matter of separate and independent investigations and proceedings before various courts, I am advised not to deal with the same in the present affidavit, particularly when neither of the parties thereto is a party to the present proceedings.

(b) Incident at R.K. Ashram Marg on 11.10.2026

73. Insofar as the removal of journalists by the police is concerned, including at R.K. Ashram Marg, where it is alleged that journalists questioning Delhi Police concerning the removal of another journalist were themselves stopped and placed in a police vehicle, it is submitted that, as per the records, police personnel at R.K. Ashram Marg were being obstructed by the crowd while performing their official duties. Consequently, such individuals were removed for the purpose of verification, and when it became evident that some of the removed persons were journalists (who were inadvertently removed as a part of the crowd), they were

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immediately released. The same stands corroborated by a video recorded by the journalist Mr. Sreenivasan Jain himself, in which he is seen recording the statement of a senior officer of the Delhi Police, and which is available at https://x.com/sreenivasanjain/status/1709230114454319606.

74. The aforesaid video further demonstrates the bona fides of the Police action, inasmuch as, upon being informed that the person who had been taken into the police vehicle was a journalist, the senior police officer present at the site clarified that the police personnel were unaware of her professional identity and had merely been requesting those present not to obstruct their movement. The officer thereupon directed her immediate release.

75. It is submitted that certain journalists, who either voluntarily offered themselves for removal or were inadvertently removed, declined to be released even after being identified as journalists. This was evidently part of their journalistic endeavour to cover the circumstances and consequences of the removal of other protesters. Despite being politely requested to leave, they chose not to do so, expressly stating that they wished to accompany the protesters to ascertain where they were being taken and the manner in which they were being treated. The police authorities had no objection to such



journalistic activity and, accordingly, permitted them to accompany the removed protesters.

(c) Journalists of Peek TV at Connaught Place on 11.10.2026

76. It is submitted that insofar as the allegation that "Vedanta Agarwal and Sara Khan of Peek TV were reportedly dragged and detained while covering the demonstrations, notwithstanding the display of press identification" *(paragraph 17 of the instant petition, @ page 11; and, to the like effect, paragraph 27 of W.P.(C) No. 1364 of 2026, @ page 19)* is concerned, it is submitted that, according to the video account of the said journalists themselves, upon one of them informing the police personnel that he was from the media, the Deputy Commissioner of Police present at the site recognised him and directed the police personnel not to remove him, and also assisted his colleague in moving out of the commotion *("he came inside the bus and he asked the police personnel to not detain me because I'm from the media.")*.

77. The said journalists further state that an officer of the rank of Deputy Commissioner of Police thereafter met them and expressed regret. The said account itself demonstrates that the senior officers of the Delhi Police acted promptly to ensure that journalists, once identified, were not removed, and that any inconvenience caused in the midst of the crowd-control operation was not intentional. The remaining allegations made in the said video are denied for want of

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particulars. The said video is available at https://www.instagram.com/reel/DeWK6etB8r3/.

(d) Allegations relating to Mr. Ryan Thomas

78. It has been contended by Mr. Ryan Thomas, a journalist associated with The Caravan, who has also filed Contempt Petition (C) Diary No. 64371 of 2026 that he sustained injuries at the hands of the police on 11.10.2026, and that he was removed by the police at about 6:30 PM near Janpath, assaulted and released half an hour later. It is stated that he thereafter went to Dr. Ram Manohar Lohia Hospital, where Medico-Legal Certificate No. 271698 dated 11.10.2026 was issued.

79. It is submitted that Mr. Ryan Thomas was neither detained nor kept at any holding facility during the protest held on 11.10.2026. He was merely removed from the site in exercise of the statutory powers vested in the police authorities, in the course of the ongoing crowd protest.

80. It is submitted that in so far as the Medico-legal case is concerned, the matter is presently under investigation. I am, therefore, advised not to disclose any further details in this regard at this stage in the present affidavit.

81. It is pertinent to note that no independent complaint in this regard has been received at Police Station Connaught Place. The statement of the injured has been recorded by ASI Rajender, No. 3122/ND (PIS No. 28012198) of Police Station Connaught Place, wherein he has stated that he did not file any complaint at Police Station

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Connaught Place and that he was not taken to any police station by police personnel. The relevant CCTV footage has been duly preserved so as to facilitate the enquiry.

82. It is further submitted that Mr. Ryan Thomas is not a petitioner in any of the present Petition (s), and has separately instituted Contempt Petition (C) Diary No. 64371 of 2026 founded upon the very same allegations, which is pending consideration before this Hon'ble Court. The Answering Respondent craves leave to deal with the said allegations in detail in those proceedings.

(e) ***Other incidents alleged in the petitions***

83. It is submitted that the bona fides of the Delhi Police stand borne out by the very material relied upon by the Petitioners. By the Petitioners' own showing, the reporter of The Hindu was released at Connaught Place on 11.10.2026 as soon as she was recognised as a journalist, the petitioner in W.P.(C) No. 1364 of 2026 itself stating that she was released "after police personnel recognised that she was a journalist with The Hindu, and before the bus departed" (paragraph 30, @ page 21, and Annexure P-30 thereto, @ pages 166 to 167).

84. It is submitted that whilst denying the allegations qua the three journalists of The Indian Express, it is submitted that, by the Petitioner's own averment, they were released after approximately forty-five minutes (paragraph 18 of the instant petition, @ page 12). That Mr. Paranjoy Guha Thakurta, according to his own statement, was not taken to any police station, but states that the car in which

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he was placed "was driven around for around 20 minutes and then released at a point half a kilometer away", and that he "was released at approximately 1.00 pm" (paragraphs 8 and 11 of his statement, Annexure P/10 to W.P.(C) No. 1366 of 2026, @ page 72).

85. Further Mr. Shyam Meera Singh, on whose account the Petitioner in W.P.(C) No. 1366 of 2026 relies, admits in his own statement that, in the midst of a confrontation between groups at Connaught Place and while being a part of an illegal protest, he was shouting slogans, which a journalist would never indulge in. He further states that upon reaching the police station, "That's when I tried to escape from illegal detention" (Annexure P/16 to W.P.(C) No. 1366 of 2026, @ page 127 to128). These statements, on his own account, indicate his active participation in the events unfolding at the site, rather than the mere presence of a 'journalist' in the course of reporting them.

86. The remaining individual instances alleged in the Petition(s), including those pertaining to other journalists, are founded entirely upon media reports and social media posts, and are denied for want of particulars. The list annexed as Annexure P/15 to W.P.(C) No. 1366 of 2026 (@ pages 123 to 126) is undated, unsigned and of unknown authorship, and includes incidents at Pune and Mumbai (entries 16, 35 and 36 thereof) which are beyond the jurisdiction of the Delhi Police.



(f) Alleged seizure of media equipment

87. It has also been falsely contended by the Petitioners that the police arbitrarily seized media equipment from journalists during the protest. It is submitted in this regard that as per the report of the New Delhi District, no journalist was either detained in any of the cases registered or the entries recorded at the police stations of the New Delhi District during the CJP Protest, and no equipment or article belonging to any journalist was ever seized. Any journalist who was inadvertently removed from the site in the course of crowd control was released upon identification, as set out hereinabove.

88. It is respectfully submitted that the power of the police to seize property is regulated by Sections 105 and 106 of the Bharatiya Nagarik Suraksha Sanhita, 2023, and the custody of unclaimed property found in public places is governed by the Delhi Police Act, 1978.

89. It is submitted that no material or article was seized from any journalist. The articles seized from other persons were seized in exercise of statutory powers and included items found lying unclaimed, such as mobile phones, etc.

90. It is respectfully submitted that in view of the aforesaid facts and circumstances, the Delhi Police has, at all times, acted bona fide and in the discharge of its statutory obligation to maintain public order in the National Capital, while taking the utmost care to protect the rights of the press, and that the present petitions, being devoid of merit, deserve to be dismissed.

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91. In view of the foregoing, it is most respectfully prayed that this Hon'ble Court may be pleased to dismiss the instant Writ Petition and the connected Writ Petitions, and to pass such other or further orders as this Hon'ble Court may deem fit and proper in the facts and circumstances of the case.

92. The present Counter Affidavit is being filed bona fide and in the interest of justice.

DEPONENT
(SURENDER KUMAR) IPS
Joint C.P./Crime

16 NOV 2026

VERIFICATION

Verified at Delhi on this 16 NOV 2026 day of November, 2026 that the contents of the above Counter Affidavit are true to my knowledge and belief, that no part of it is false and that nothing material has been concealed therein.

DEPONENT
(SURENDER KUMAR) IPS
Joint C.P./Crime

16 NOV 2026

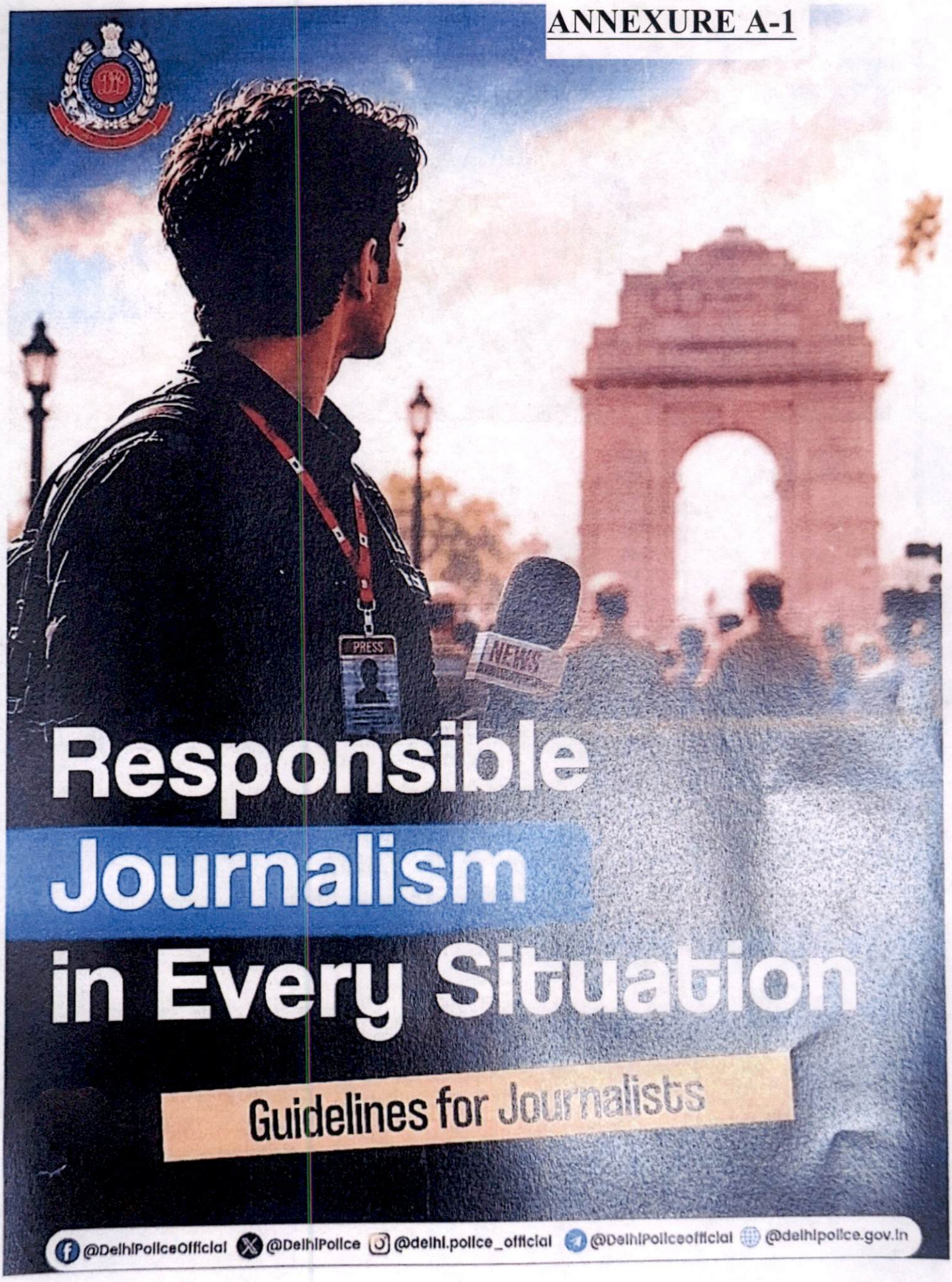
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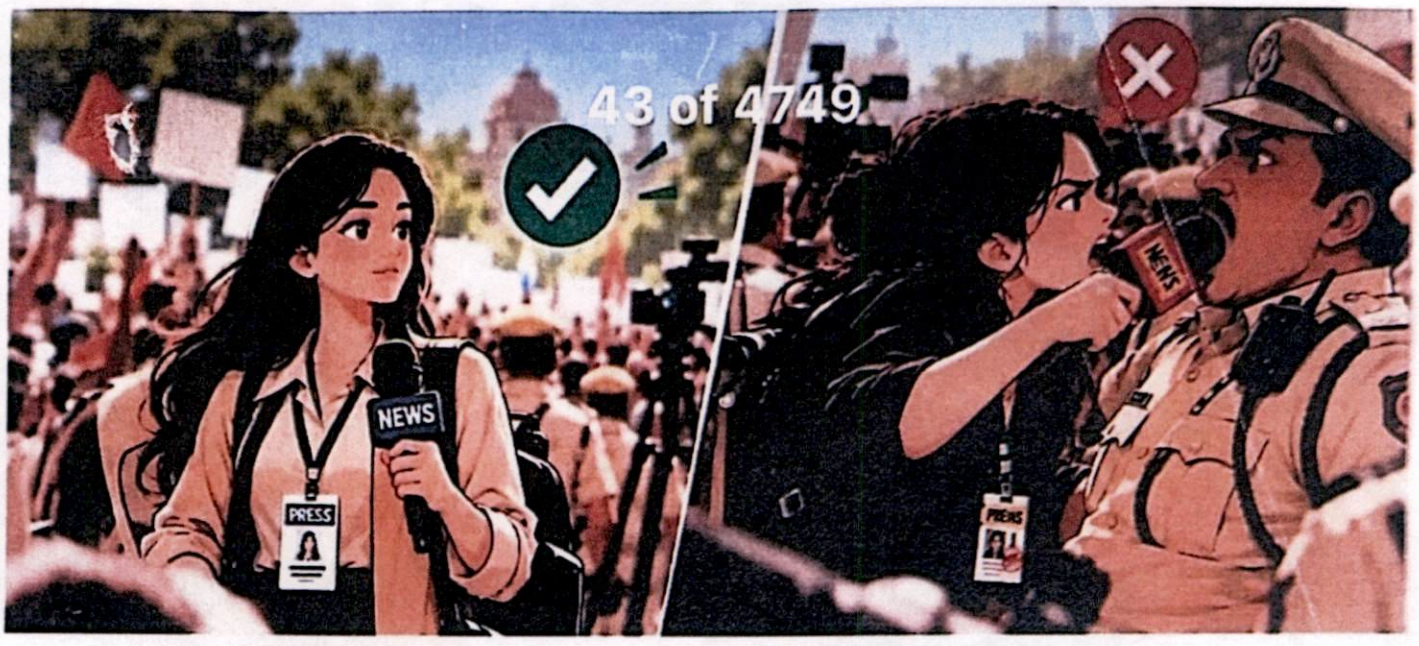
ATTESTED
Mrs. Sangita Mishra
Advocate Delhi
Regn. No.16967
Govt. of India
Mob. No.9990312780

I identify the deponent who has signed/T.I in my presence
Mr./Ms. .....Adv./Self
ID No.:.....

NOTARIAL REGISTER
Sr. No. 428 PAGE 35
Dated 16-11-26 Reg. No. 15

ANNEXURE A-1


PRESS
NEWS
Responsible
Journalism
in Every Situation
Guidelines for Journalists
@DelhiPoliceOfficial
@DelhiPolice
@delhi.police_official
@DelhiPoliceofficial
@delhipolice.gov.in



1



All journalists assigned to cover protests are advised to **CARRY VALID IDENTITY CARDS** issued by their respective organisations and/or valid PIB/DIP accreditation cards.

2



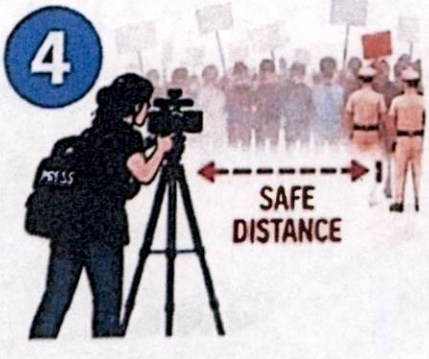
They should keep their identification cards **VISIBLY DISPLAYED AT ALL TIMES** to facilitate identification by law enforcement agencies present at the site.

3



They should also ensure that their presence or activities **DO NOT OBSTRUCT POLICE OPERATIONS** or the movement of law enforcement personnel.

4



During tense situations, journalists present at the site should **MAINTAIN A REASONABLE AND SAFE DISTANCE** while covering and recording the proceedings. They should position themselves in a manner that clearly distinguishes them from protestors.

ANNEXURE A-2

PRESS INFORMATION BUREAU
GOVERNMENT OF INDIA
***

GUIDELINES FOR GRANT OF ACCREDITATION TO WORKING JOURNALISTS AT THE HEADQUARTERS OF THE GOVERNMENT OF INDIA

1. SHORT TITLE

These guidelines may be called the "**The Central Media Accreditation Guidelines, 2022**".

2. COMMENCEMENT AND SCOPE

2.1 These guidelines shall apply for grant of accreditation to working journalists and other categories of persons (as may be specified in this behalf) at the Headquarters of the Government of India and shall supersede all previous guidelines in this regard.

3. AMENDMENTS

The Central Government may make amendments to the guidelines from time to time as considered necessary.

4. DEFINITIONS

4.1 "Central Media Accreditation Committee" means a Committee constituted by the Government of India under these Guidelines;

4.2 'Digital News Publisher' means a publisher of news and current affairs as defined in clause (t) of rule 2 (1) of the Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021;

4.3 'Newspaper' shall have the same definition as given in the Press and Registration of Books Act, 1867;

4.4 'News Media Organization' means an organization running a newspaper, a news agency, a satellite TV news channel, Doordarshan News, All India Radio (News Services Division), and a Digital News Publisher;

4.5 A 'Daily Newspaper' shall be published on not less than five days in a week.

4.6 A 'Weekly' and 'Fortnightly' newspaper shall have not less than 45 or 22 issues in a year, respectively.

4.7 'Working Journalist' means a working journalist as defined in the Occupational Safety, Health and Working Conditions Code 2020;

4.8 'Accreditation' means recognition of working journalists and other such persons as may be specified by the Government of India for purpose of access to designated official sources of information in the Government and also to news material, written

or pictorial, released by the Press Information Bureau and/ or other agencies of the Government of India;

4.9 'Unique visitors' refers to the number of distinct individuals requesting pages from a website during a given period, regardless of how often they visit;

4.10 'News Aggregator' refers to an entity which, using software or web application, aggregates news content from various sources, such as news websites, blogs, podcasts, video blogs, user submitted links, etc. in one location;

4.11 'Domain Registration' refers to the process of registering a domain name which identifies one or more IP addresses with a name that is easier to remember and used in URLs to identify particular Web pages, and the person or business that registers domain name is called the domain name registrant.

5. THE CENTRAL MEDIA ACCREDITATION COMMITTEE

5.1 The Government of India shall constitute a Committee called the Central Media Accreditation Committee (hereinafter referred to as the CMAC), chaired by the Principal DG, PIB and comprising of up to 25 Members nominated by the Government of India to discharge the functions laid down under these guidelines.

5.2 The CMAC once constituted shall function for a period of two years from the date of its first meeting.

5.3 The CMAC shall meet once in a quarter or more frequently, as may be considered necessary.

5.4 The decisions of the CMAC shall be taken on the basis of majority of the members present, and any dissent may be duly recorded.

5.5 There shall be a sub-Committee of the CMAC consisting of five members, nominated by the CMAC, and chaired by Principal DG, PIB to consider and take decisions on accreditation cases on matters referred to in para 8.2, during the interregnum of two meetings of the CMAC, and all such decisions shall be placed before the CMAC in its next meeting for information.

6. GENERAL TERMS OF ACCREDITATION

6.1 Accreditation will be given to working journalists, freelance journalists, veteran journalists, camerapersons and technicians, as per these guidelines in accordance with the eligibility conditions laid down in schedule I, and within the Quota and other conditions specified in Schedule II and Schedule III of the guidelines.

6.2 Accreditation shall be granted only to those persons referred to in para 6.1 who reside in Delhi-National Capital Region (NCR).

6.3 Accreditation shall not confer any official or special status on news media representatives, but shall only recognize their identity as a professional working journalist.

6.4 Accreditation of persons referred to in para 6.1 of only those news media organisations will be considered which have been functioning or operating for at least one year

continuously before the date of application and on the basis of recommendation duly forwarded by the Editor-in-Chief/Editor/ Executive Editor/ Resident Editor of that organisation.

6.5 The publication should primarily carry content as news and/or comments of general public interest, including news and information emanating from the headquarters of the Government of India.

6.6 Publications containing information on specialized interest such as in-house journals, technical/ professional publications etc. are not eligible for accreditation.

6.7 The organisations owned and run by Cable Operators providing Cable Television service through Cable Television Network will not be eligible for accreditation.

6.8 The accreditation is liable to be suspended/withdrawn if a journalist who has been granted accreditation:

a) uses the accreditation for non-journalistic activities;
b) has been charged with a serious cognizable offence;
c) if he/she or the news media organisation whom he/she represents is found to have furnished false/ fraudulent/ forged information/ documents, in which event the working journalist/ media organisation shall be debarred from accreditation for up to a maximum of five years but not less than two years, as may be decided by CMAC;
d) ceases to be part of the organisation on whose behalf he/she is accredited or the news media organisation itself ceases to function, except closure for a short period for reasons beyond control (such as industrial disputes, public health emergencies or natural calamities);
e) does not bring to the notice of Principal DG, PIB in writing within 7 days that he/she ceases to represent the news media organisation on whose behalf he/ she has been accredited;
f) does not apply for online renewal by the specified date along with the procedural requirements, except under exceptional circumstances;
g) if the news media organisation on behalf of which the accreditation has been granted recommends the withdrawal of accreditation, in which case the organisation shall return the accreditation card to PIB to avoid misuse;
h) acts in a manner which is prejudicial to 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;
i) violates any of the terms and conditions of the accreditation under these guidelines;
j) does not fulfil the conditions on which the accreditation was granted.

6.9 The CMAC has the right to recommend or reject grant of accreditation.

6.10 The cases approved for accreditation by CMAC shall be sent for police verification and the PIB accreditation card shall be issued only after satisfactory report from the police authorities and concurrence of the Ministry of Home Affairs, Government of India.

6.11 An accredited media person shall not use the words, "Accredited to the Government of India" on public/social media profile, visiting cards, letter heads or on any other form or any published work.

6.12 Accreditation will be granted for a period of one calendar year and can be considered for renewal if the accredited working journalist fulfils the criteria of the guidelines.

6.13 It shall be the responsibility of the news media organisation to intimate to PIB in writing, within 7 days of any change in ownership, name of organisation, name of group or chain, or the domain name (in case of website) in respect of which accreditation is granted on behalf of the organisation.

6.14 The person granted accreditation shall surrender the existing card to PIB within 7 days in event of any change in the category for which accreditation is granted, failing which the journalist would be debarred from accreditation for one year.

7. PROCEDURE FOR GRANT OF ACCREDITATION

7.1 The procedure to apply for accreditation shall be laid down by the Principal DG, PIB and the applicant will be required to fill an online form and submit such documents as may be specified from time to time:

7.2 PIB may, before grant of accreditation or its renewal, call for any additional information and documents considered necessary for the purpose of ensuring credibility and genuineness of the claims made in the application.

8. Functions of Principal DG, PIB:

8.1 To convene the meeting of CMAC as the Chairman of the Committee.

8.2 To convene the meeting of Sub-Committee of CMAC and decide on applications for grant of accreditation to an eligible person in matters on urgency or exigency.

8.3 To decide applications for grant of accreditation in respect of the following category of cases:

(i) where an accredited journalist changes his organisation to another accredited organization and informs within 7 days from the date of relieving, failing which it would be treated as fresh case. This is to be allowed provided the new organisation is eligible for accreditation as per the guidelines.

(ii) for change in category of Technician/Correspondent/Cameramen/Editor subject to fulfilment of conditions laid down in the guidelines;

(iii) serving officers and officials of PIB, DD (News) and AIR NSD for functional requirements;

(iv) Editor of a Daily, Weekly, Fortnightly, TV channel or of a digital news publisher, being a citizen of India, subject to security clearance and such other conditions as may be specified by the CMAC;

8.4 Decisions referred to in para 8.3 (i) & (ii) shall be placed before the CMAC in its next meeting for information.

SCHEDULE I

ELIGIBILITY CONDITIONS

(Clause 6.1)

(A) News Representatives

S. No.	Category	Conditions
1.	Working Journalists as defined in the Occupational. Safety. Health and Working Conditions Code 2020 engaged in news gathering/news bureau of a news organization	(i) Minimum 5 years' professional experience as full time working journalist/cameraman in news organization(s). (ii) For accreditation on behalf of news media organization and persons working on honorarium/retainership/part-time basis will not be treated as working journalist for the purpose of accreditation. In case of contractual journalists. the contract should be valid for minimum period of 1 year from the date of application. Documents to be submitted: (a) Copy of Aadhaar Card/PAN Card/Passport. (b) Recommendation letter from the Editor/Editor-in-chief/Executive Editor/Resident Editor of the organization. (c) Copy of the appointment letter of the present organization. (d) Copy of salary slips of last three months. (e) Copy of appointment and relieving letter of previous organization. (f) Clippings/photographs with byline of past six months (g) Residence proof - electricity bill/rent agreement/telephone bill/ Voter Card, etc.
2.	Freelance working journalist, not employed by any news media organization	(i) Minimum 15 years' professional experience as full time working journalist/cameraman in news organization(s). (ii) Must have held PIB card for at least 5 years.

		Documents to be submitted: a. Copy of Aadhaar Card/PAN Card/ Passport. b. Copy of appointment and relieving letter(s) of previous organization(s) c. 20 clippings/photographs with byline published in past six months in case of print media. Clippings from in-house journals will not be accepted. d. For electronic and digital/online media journalists, links of their journalistic work numbering at least 20 in the last six months.
3.	Veteran Journalist	Accreditation card under this category will be given to a freelance journalist subject to the following cumulative conditions: a) Persons shall have attained the age of 65 years. b) He/she has been a working journalist for at least 30 years. c) Has a publicly acclaimed distinguished career as a journalist.
4.	Technicians (Electronic media)	The technician must be working full time with the organization, duly recommended by the Editor/authorized signatory.

(B) Eligibility conditions for granting accreditation on behalf of organizations/Agencies:

1. Print Media

Sl. No.	Category	Conditions
1.	Newspapers (Daily)	Circulation should not be less than 10,000 copies of 6 full size pages or 12 pages of tabloid size per publishing day.

2.	Newspaper (Weekly/Fortnightly)	Circulation should not be less than 15,000 copies per publishing day. The size of the newspaper should be 6 full size pages or 12 pages of tabloid size for weekly newspaper; and 8 full size pages or 16 pages of tabloid size for fortnightly newspaper.
3.	Periodicals/Magazines (up to fortnightly only)	Circulation should not be less than 10,000 copies with a minimum of 40 pages per publishing day.

Additional condition: The publisher should have filed annual statement with RNI for the last three consecutive years.

Documents required: (i) RNI registration certificate (ii) Circulation certificate from RNI/ABC accompanied by letter from Chartered Accountant certifying the document. (iii) Newspapers whose daily circulation is between 10,000 to 25,000 should submit circulation certificate certified by CAG/RNI empaneled chartered Accountant.

(C) News organizations (Electronic Media)

Sl. No.	Category	Conditions
1.	Satellite Channels (News and Current Affairs)	The Channel should be a News and Current Affairs Channel having valid permission of the Ministry of Information and Broadcasting under the Uplinking and Downlinking Guidelines for private satellite TV channels Documents to be submitted: 1. Copy of permission letter from Ministry of Information and Broadcasting for uplinking and downlinking as News and Current Affairs Channel. 2. Copy of renewal permission letter from Ministry of Information and Broadcasting for uplinking and downlinking as News and Current Affairs Channel. 3. Copy of permission of new Name/ logo from Ministry of Information and Broadcasting (if name/logo has been changed).

(D) News Agencies

1.	Print and Electronic (including photo services)	(a) Should have at least 100 subscribers (list to be attached) (b) Valid permission of Ministry of Information and Broadcasting under the uplinking and downlinking guidelines (in case of electronic news agency)

Documents required: (i) Registration certificate of News Agency; (ii) Latest annual revenue statement certified by CA. (iii) Copy of the latest agreement with subscribers with terms and conditions

(E) Digital news publisher

(i) The general terms of accreditation, as mentioned earlier in these guidelines, shall be applicable to journalists applying within this category as well.

(ii) News aggregators will not be considered for accreditation.

(iii) The news publisher has furnished requisite information to the Ministry of Information and Broadcasting under Rule 18 of the Information Technology (intermediary Guidelines and Digital Media Ethics Code), Rules, 2021, and has not violated the rules;

(iv) The website must be at least one-year-old and must be continuously in operation under the same name (website address) for minimum of one year. The period shall be calculated backwards from the date on which the applicant applies for accreditation on behalf of that particular website. This shall be certified by their domain registration. The domain name of the site should also be registered for at least next two years from the date of application

(v) The applicants must report their website's average monthly unique visitor count of last six months duly certified by the website's CAG-approved/empanelled auditors.

(vi) The journalists should have a minimum of five years' experience of working in media organisations and should be appointed by the digital news publisher for full time news content creation.

(vii) The website should have a registered office in India and correspondents should be based in Delhi/NCR. The Editor of the news portal should be an Indian national.

(viii) It will be the responsibility of the website owner to comply with extant rules and regulations as laid down by the Government of India.

(ix) If the website stops functioning, the accreditation granted on its behalf shall be withdrawn. The same should be communicated to PIB within 7 days by the applicant as well as by the organisation owning the website.

(x) In case the information submitted by the applicant is found to be false/ incorrect in any manner, the applicant can be suspended and/ or debarred from applying for accreditation for the next three years.

(F) Foreign Media

Foreign News Media working journalists and organisations will also be governed by the same eligibility as mentioned at (A), (B), (C), (D) and (E) of this schedule. The application would be processed after the receipt of recommendation/clearance from Ministry of Home Affairs & Ministry of External Affairs. However, no freelance card will be granted under this category.

For foreign media, PIB card will be issued till the validity of the J Visa.

(G) Terms and Conditions for Change in Organisation and Category:

1) The accredited journalist shall surrender the existing card to PIB within 7 days from the date of relieving from previous organisation.

2) If the change is not applied within 1 month from the date of relieving, the case would be treated as fresh case.

3) Documents required are:
   (i) Recommendation letter from Editor/ Authorised signatory for grant of accreditation (not applicable for freelance category).
   (ii) Copy of appointment letter of present organisation.
   (iii) Relieving order from previous organisation.

(H) Renewal:

1) All the card holders will have to apply for online renewal of the PIB card annually, and the renewal application will be considered in accordance with the extant Guidelines.

2) At the time of renewal, the documents asked for may be furnished without fail for the renewal to be considered.

SCHEDULE-II

SCHEDULE OF QUOTAS FIXED FOR VARIOUS CATEGORIES OF NEWSPAPERS/MEDIA ESTABLISHMENTS

(Clause 6.1)

(A) ***PRINT MEDIA***

1. Dailies/Weekly/Fortnightly

	Circulation figures	Number of Accreditations
1.	10,000 to 25,000	01
2.	25,001 to 50,000	02
3.	50,001 to 75,000	04
4.	75,001 to one lakh	10
5.	Above 1 lakh	15

2. News Agencies:

Agency	No. of Subscribers	No. of Accreditation
Print	100-500	20
	above 500	50
Electronic	100-500	12 Correspondents + 12 Camerapersons + 12 Technicians
	above 500	15 Correspondents + 15 Camerapersons + 15 Technicians

3. Foreign Based Dailies and Periodicals-07

4. Foreign News Agencies-20

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SCHEDULE – III

SCHEDULE OF QUOTAS FIXED FOR VARIOUS CATEGORIES OF ELECTRONIC MEDIA & DIGITAL NEWS PUBLISHERS (CLAUSE 6.1)

1. **TV News Production/Telecast/Organization:**

	Category	Number of Accreditations
1.	Satellite news TV channel	15 Correspondents + 15 Cameramen + 15 Technicians

2. **Foreign TV/Electronic Media:**

	Category	Number of Accreditations
1	Radio Broadcasting Organizations	4 Correspondents
2	TV News Telecasting Organisation and News Agencies	8 Correspondents and 8 Cameramen/technicians
3	TV and Radio News Channels with hourly telecast of News and current affairs programmes	12 Correspondents 12 Cameramen

3. **Digital News Publisher**

S. No.	Category	Number of Accreditations
1	Websites with ten lakh to fifty lakh unique visitors per month for the last six months	1
2	Websites with fifty lakh to one crore unique Visitors per month for the last six months	2
3	Websites with more than 1 crore unique visitors per month for the last six months	4

Note: Print publications and TV news channels on behalf of whom accreditation has been granted will accommodate/adjust the accreditation requirements of eligible working journalists of their corresponding digital news publications within their existing quota.

ANNEXURE A-3

Link of the video :- https://x.com/OpIndia_com/status/2108182905206046813

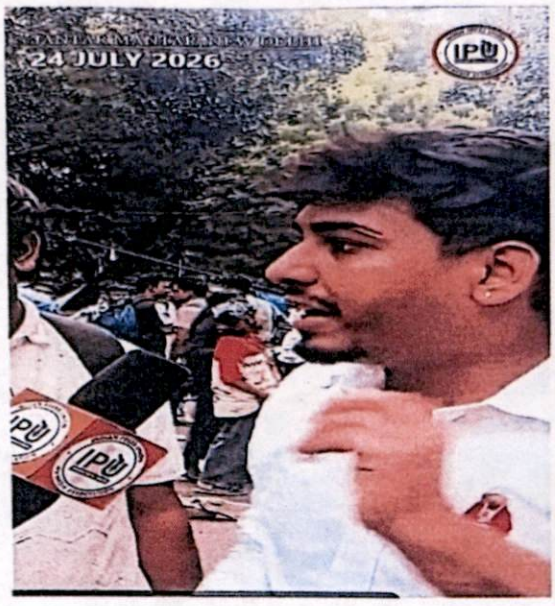
यहाँ वीडियो का हिंदी ट्रांसक्रिप्ट (Transcript) दिया गया है:

मार्केट में एक नया स्कैंडल आया हुआ है। एंड रिसेंटली (And recently), द स्कैंडल इज़ अबाउट (the scandal is about) कि पैसे देकर आपको प्रेस आईडी मिल रही हैं और ये कौन दे रहा है? एक वेबसाइट है 'इंडियन प्रेस यूनियन' (Indian Press Union) करके। उसका मैं यहाँ पे वेबसाइट का स्क्रीनशॉट भी लगा दूँगी। उसके साथ ही ये अभी रिसेंटली इनका कोई मोहम्मद अयान करके एक जर्नलिस्ट है, उसको पकड़ा गया था। उसको डिटेन किया था पुलिस ने—दिल्ली पुलिस ने—ये पूछते हुए कि क्या आपकी प्रेस आईडी पीआईबी (PIB) रजिस्टर्ड है? तब उसने बोला—नहीं। एंड देन ही वाज़ डिटेंड (And then he was detained).

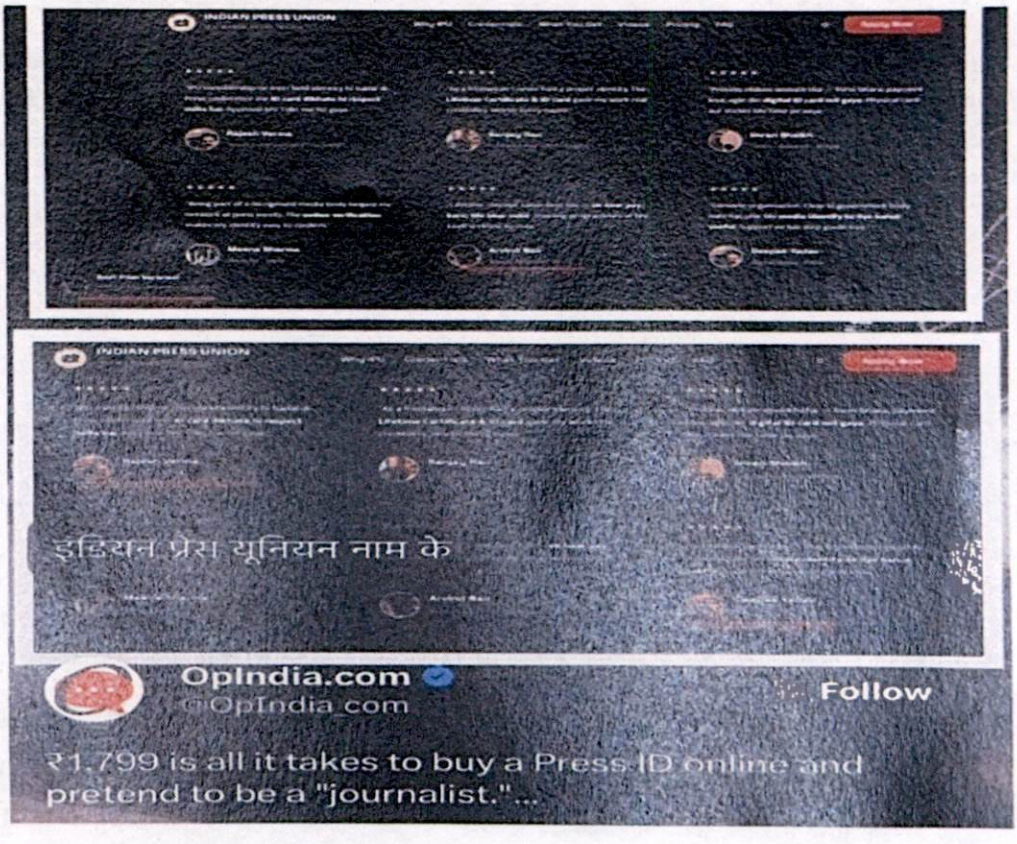
अदर दैन दिस (Other than this), इनकी वेबसाइट अगर आप देखेंगे, तो 1800 रुपये में ये लोग फिजिकल मेंबरशिप देते हैं आपको फॉर लाइफटाइम (for lifetime) और इसमें आपको प्रेस आईडी कार्ड भी देते हैं। और डिजिटल वाला देते हैं 1000 रुपये में। और इनकी वेबसाइट खोलकर देखें, तो नीचे से एक नोटिफिकेशन बार-बार आता रहता है कि 9 मिनट पहले मान लीजिए दीपक ने रजिस्टर्ड किया या फिर 2 मिनट पहले जयपुर से किसी ने रजिस्टर्ड किया। तो आप ये सोचिए कि कितने सारे लोग हैं जो इस अनवेरीफाइड पेज—यानी कि इंडियन प्रेस यूनियन नाम के इस पेज में रजिस्टर कर रहे हैं, प्रेस आईडीज़ निकाल रहे हैं और किसी भी इवेंट में जाकर ऐसे प्रदर्शन कर रहे हैं जैसे वो जर्नलिस्ट हैं।

वेन आई केम अक्रॉस देयर यूट्यूब पेज (When I came across their YouTube page), उसमें आरटीआई एक्टिविस्ट बोल रहे हैं कि क्योंकि हमें जाने की इतनी फ्रीली ऐसे गवर्नमेंट इवेंट्स या फिर कोई भी प्राइवेट इवेंट हो, वहाँ पे जाना अलाउड नहीं होता है, तो वो ये वाली आईडीज़ लेकर कहीं भी घुसते हुए जा रहे हैं। तो प्रोटेस्ट के दौरान भी इनके ही थ्रू रजिस्टर्ड कितने सारे ऐसे लोग हैं जो ये बोलकर आ रहे हैं कि हम इंडिपेंडेंट जर्नलिस्ट हैं। हालांकि, ये जो खुद इंडियन प्रेस यूनियन है, ये एक एमएसएमई (MSME) के तौर पे रजिस्टर्ड है एंड इट इज़ अ नॉट वेरीफाइड (And it is a not verified) जर्नलिज्म पेज। इट इज़ नॉट वेरीफाइड एनीवेयर बाय द गवर्नमेंट (It is not verified anywhere by the government) कि ये जर्नलिस्ट को ऐसे फ्रीली कोई भी प्रेस आईडी दे सकते हैं।

तो सोचिए कि प्रोटेस्टर्स के लिए कितनी बड़ी प्रॉब्लम है और उसके बाद जो जर्नलिस्ट ऐसे प्रोटेस्ट में जाकर कोई प्रोटेस्ट कवर करना चाह रहे हैं, उनके लिए ऐसे प्रेस आईडीज़ जो फेक हैं, वो कितनी बड़ी प्रॉब्लम क्रिएट कर रहे हैं। इन्क्लूडिंग (Including), जो दिल्ली पुलिस पे ये लोग माइक चढ़ाकर, खुद भी चढ़कर ये लोग वीडियोस बना रहे हैं, तो आप ये खुद सोचिए कि इंडियन प्रेस यूनियन कितना प्रॉब्लमेटिक है अभी, क्योंकि कितने सारे लोग ऐसी फेक आईडीज़ लेकर कहीं पर भी चले जा रहे हैं, फिर पुलिस पर दबाव बना रहे हैं और फिर सामने फेक न्यूज़ भी ला रहे हैं।


24 JULY 2026
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ANNEXURE A-4

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Soochna Bhawan, 8 – CGO Complex,
Lodhi Road,New Delhi – 110 003

PR/8/26–27-PCI **Dated: 15.10.2026**

PRESS RELEASE

Guidelines for Journalists Covering Protests and Demonstrations

In view of the prevailing scenario and the need to facilitate the orderly and effective coverage of protests and demonstrations, the Press Council of India, at its meeting held on 14 October 2026, adopted the Guidelines for Journalists Covering Protests and Demonstrations. The guidelines seek to facilitate the effective discharge of journalistic duties while promoting the safety of media personnel, responsible reporting and better coordination among journalists, media organisations and law enforcement authorities. The Press is advised to follow guidelines set out below:

1. Identification and Professional Conduct

- Carry a valid identity card issued by your media organization/newspaper and/or valid PIB/DIP accreditation, as applicable.
- Keep your valid Press identification cards visibly displayed at all times. When using a lanyard, ensure that it is worn and secured carefully to minimize the risk of entanglement during crowd movement or confrontations.
- Clearly and calmly identify yourself as a journalist when approached by law enforcement personnel.
- Maintain neutrality and professionalism. Do not participate in demonstrations, take sides, provoke confrontations, or interfere with protesters, counter-protesters, or police.
- Remain respectful, follow police orders, avoid arguments during tense situations, and comply with lawful instructions, particularly those issued for immediate safety reasons, while calmly asserting your Press status when necessary.

2. Positioning and Crowd Safety

- Maintain a reasonable and safe distance from confrontations, particularly when tensions escalate or police action is anticipated.

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- Do not attach cameras or recording equipment to police barricades, vehicles, or other equipment in ways that obstruct movement or damage property.
- Move carefully through crowds, taking short steps to reduce the risk of falling or being trampled.
- Continuously reassess your position in relation to protesters, counter-protesters, police, and other potential sources of danger.

3. Situational Awareness and Escape Planning

- Continuously scan your surroundings for changes in crowd behaviour, approaching individuals, potential confrontations, changes in crowd noises, and emerging hazards.
- Keep an escape route in mind and update it as conditions change. Identify nearby exits, open streets, sidewalks, and safe locations.
- In smoke or tear gas, use visible landmarks and safe routes to leave the affected area without moving deeper into the crowd.

4. Personal Protective Measures and First Aid

- Carry a compact emergency kit containing:
  - (i) A basic first-aid kit and essential personal medication.
  - (ii) Drinking water and high-protein snacks,
  - (iii) A flashlight,
  - (iv) Washcloth/ hand towel,
  - (v) Eye Protection/goggles.
- Depending on the assessed threat, consider suitable protective headgear and body armour. Protective equipment must not encourage unnecessary risk-taking.
- Learn basic first aid and practise using protective equipment before deployment.
- Never touch, pick up, or attempt to move tear-gas canisters, flash-bang devices, or smoke grenades. They may remain hot, explode, or contain hazardous residue.

5. Coordination and Communication

- Maintain regular contact with your newsroom throughout the assignment. Newsrooms should designate a point of contact to monitor journalists' locations and respond to emergencies.
- Freelancers should ensure that a trusted editor or contact knows their location, assignment plan, and expected return time.
- Look out for fellow journalists, particularly when working alone, and maintain communication with colleagues whenever feasible.
- For planned demonstrations, media organizations should coordinate with designated police and public information officers or press liaisons where feasible, to clarify communication protocols and identify any designated media staging areas.

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6. Ethical and Responsible Reporting

- Report events accurately, objectively, and impartially. Distinguish verified facts from allegations, opinions, and unconfirmed claims. Follow the applicable Norms of Journalistic Conduct on Accuracy and Fairness.
- Verify information through multiple sources wherever possible. Ask witnesses how they obtained their information and assess their proximity to the event, visibility, reliability, and potential biases.
- Treat statements from protesters, event organizers, police, and government authorities with equal journalistic scrutiny. Attribute claims clearly and seek corroboration.
- Do not broadcast or publish real-time police positions, tactical movements, or escape routes when doing so could compromise safety or operational security.
- Describe observable actions rather than assuming people's motives, intentions, or emotions.
- Exercise particular care when filming or identifying minors, vulnerable individuals, injured people, and private citizens in distress. Consider whether publication could expose them to retaliation, harassment, any other harm, or violate their right to privacy.
- Do not allow equipment, live-broadcast commitments, or pressure to obtain exclusive footage to override safety considerations.

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