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Research Paper

Judicial review and basic structure doctrine

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ABSTRACT

One of most crucial constitutional mechanisms in India is the judicial review which, as the highest law of the land, permits the courts to check the legality of legislative and executive acts. The Supreme Court of India has over time continued to widen this scope, to not only include Acts of Parliament, but also executive determinations, administrative actions, the exercise of powers by subordinate courts, and in this way, the Indian judiciary has evolved to reflect one of the strongest powers in the world. Judiciary review is based upon the supremacy of the constitutional law: any law or action, which contradicts the supremacy of the constitutional law must be declared inadmissible and threats to the supremacy of the constitutional law. Articles 13, 32, 131136, 137, 226, 246, and 368 of the Indian Constitution specifically provides the right to audit the legislative branch by the judicial branch, Acts deemed unconstitutional by the Judiciary can be struck down by the Courts. Judicial review was further reinforced by the Basic Structure Doctrine which was first pronounced in a landmark case, Kesavananda Bharati case (1973). This paper critically analyzes the extent of judicial review in India, its development and limitations with a special reference to the Basic Structure Doctrine, judicial activism as well as the limits to legitimate judicial interpretation and overreach. The paper examines the provisions of the constitutions, landmark cases and comparative views in the USA, Germany, United Kingdom, South Africa, and France. The results hint at the possibility that judicial activism has played a critical role in safeguarding the rights of the people and aligning the gaps in the legislation, other than taking on the role of filling legislative voids.

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1. INTRODUCTION

The ability of the courts to investigate the legislative and executive happenings and review their legality is referred to as judicial review. Judicial review refers to the use of the judicial restraint to the legislative and executive arm of government. The idea was first introduced in the theories of limited government and the existence of the constitution as the highest law [1]. Any act of the common law-making organs which infringes the provisions of the supreme law shall be void and there must be a body with the power to declare such acts of law making invalid. This inference is based on the very assumption that there exists a supreme law which forms the foundation of other legislative authorities within the body politic.

The Indian Constitution like all written constitutions follows the principle of Separation of Powers amongst the three sovereign agencies of the Indian Constitution namely the executive, the legislature, and the judiciary. The doctrine of separation of powers has not explicitly been recognised by the Indian Constitution, but the roles of the various organs have been distinguished so that it is clear that the Indian Constitution does not permit one organ to assume functionalities that basically belong to another [2]. Broadly speaking, in India, there are three critical dimensions in the doctrine of judicial review: judicial consideration of legislative role, judicial consideration of judicial pronouncement, and judicial consideration of administrative pronouncement and action.

Judges of the higher courts have been appointed with the job of maintaining the Constitution as well as the power to interpret it. Their obligation is to keep the balance of power, intended by the Constitution, to be maintained and ensure that the legislative and executive branches of the government do not go beyond the provisions of the Constitution when discharging their duties. The judicial review is thus a highly complex and dynamic issue. It has strong historical roots and depending on the circumstance, it can swell in breadth and depth. It has been considered as the basis part of the Constitution [3]. The court in the exercise of the power of judicial review vigorously protects the human rights, fundamental rights and rights of life and liberty of the citizens and also non-statutory powers of perpetual bodies as regards their powers of control of property and assets of various nature, including expenditure on hospitals, roads, overseas aid, and compensation of crime victims [4].

The Indian judicial review procedure as illustrated in Figure 1 takes linear steps through which the primary legislative or executive act, as indicated by the arrow, is taken to the court, where ultimate constitutionality will be determined. This is done by considering the legality, irrationality, and procedural impropriety, and then passing a final decision about either upholding or striking down the impugned action.

The renowned and essential "Doctrine of Basic Structure" was born as a result of judicial activism compelled by the demands of a shifting society. One such philosophy is the so-called Doctrine of Proportionality, the practical and social applicability of which in the context of India are truly enormous. Introduced in the 19 th century in Russia and adopted by Germany and France among other European countries, proportionality is a concept that demands that when it comes to restricting the exercise of fundamental rights, the legislator or administrator must resort to the least restrictive path of action [5]. The judiciary makes sure that the legislature and the administrative regulation find a proper balance between the possible damage that the law or administrative order can cause to the rights of the people and the overall goal being pursued.

In State of Madras v. V.G. Row (1952), it was noted that no abstract standard or overall pattern of reasonableness could be laid down which were applicable to all cases. The reasonableness test should be applied to each statute separately bearing in mind the type of right that is allegedly being violated, the purpose behind the restrictions being imposed, the magnitude of the wrong that is intended to be fixed, the disproportionate imposition, and circumstances at the moment [6]. The Apex Court later came up with the

concept of primary and secondary review in Om Kumar v. Union of India, in which it was held that primary review applied in relation to statutes and statutory rules, whereas secondary review applied in relation to arbitrary executive action purportedly invoking the provisions of Article 14 of the Indian Constitution.

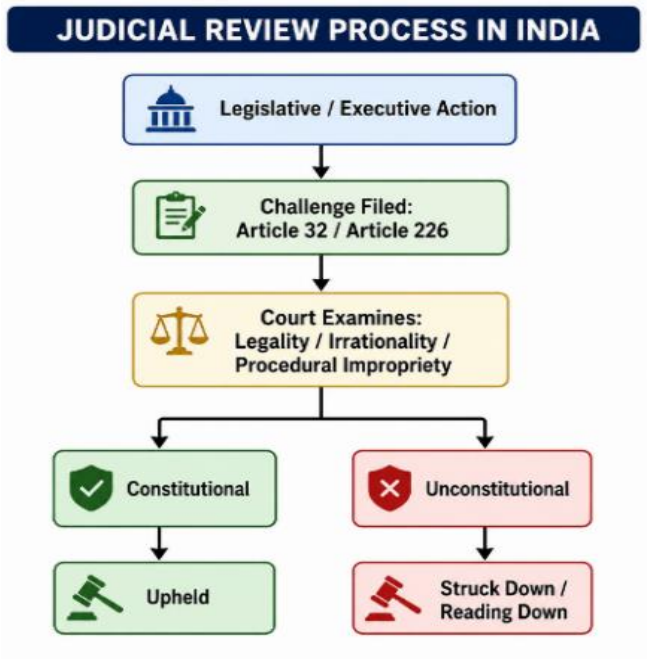


Figure 1. Judicial Review Process in India from Challenge to Constitutional Determination

In Delhi Development Authority v. UEE Electricals Engineering Pvt. Ltd., the Supreme Court expounded the judicial review of administrative action of case, under three heads: illegality, irrationality, and procedural impropriety. The courts are not keen to jump into the administration role conflicts, unless there is some inconsistency in the verdict. It is a well-established principle that the courts will not act when they are reviewing the challenges to administrative decisions in the same manner the courts would have acted in case they were hearing an appeal. To invalidate an act or order, a person ought to be able to prove that he/she acted out of ill faith, abused or misused the powers of an authority. The following, Table 1, gives a broad overview of these three main dimensions of judicial review, their scopes, and constitutional support and principal doctrines of each.

Table 1. Dimensions of Judicial Review in India Scope, Basis and Key Doctrines

Dimension	Scope	Constitutional Basis	Key Doctrine
Legislative Review	Acts of Parliament & State Legislatures	Articles 13, 32, 226	Ultra Vires / Void ab initio
Executive Review	Orders, notifications, administrative decisions	Articles 14, 21, 226	Illegality, Irrationality, Procedural Impropriety
Constitutional Amendment Review	Amendments under Article 368	Article 368 r/w Article 13	Basic Structure Doctrine

The fact that there is a concept of reading down is just another potent tool that judges can use to determine the legality of legislation. A tendency to read down under a legal requirement has now become accepted. In order to streamline legislation, it is at times needed to iron creases or to scrape rough edges smooth. But it cannot be authorized to interpret statements or words not written in the Act since in that case it would be judicial lawmaking. The legislature attacked will not be reformed, but will be unscrupulously overturned by the Courts, in the event of its inability to be recast in a new form, without assuming leading roles or competing on equal terms with the other members of the district association.

Although a provision gives arbitrary or unchecked power on a bare reading, the notion of reading down cannot be applied. By presumption, a legislation is assumed to be constitutional and in similar regards the presumption is applied to the laws passed which restrict the basic rights in a fair way.

2. RELATED WORK

Constitutional law and the political science and comparative jurisprudence have covered the scholarly literature on the judicial review in India. A full historical narrative of the working of the Indian Constitution is given by [7] including the strains between Parliament and the judiciary over the extent of judicial review. [3] attempts to offer a comparative judicial approach to the role of the Supreme Court in a democracy and argues that proportionality and rights-based review are at the heart of constitutional adjudication in modern liberal democracies.

[8] Critically suggested how a judicial activism should exercise its caution because even though courts have successfully been able to fill legislative loopholes, they should not be left to the whims of the constitution by the judiciary turning the constitution into a sham. Judicial interpretation of the constitution has long been a subject of debate, with judicial review becoming a hotly debated topic among jurists and legal academics.<|human|>The tension between judicial review and democratic legitimacy is an issue that has highly been discussed by the jurist and legal academics, [9] argued that judicial interpretation of the constitution is but a form of moral reasoning that is congruent to democratic ideals, rather than contrary to them.

The doctrine of prospective overruling and how it relates to Indian constitutional law was analysed by [10], giving a subtle insight into the retroactive applications of constitutional rulings. [11] looked into the role of the Ninth Schedule, and how it interacts with the Basic Structure Doctrine in the wake of the decision of the Supreme Court in I.R. Coelho v. State of Tamil Nadu. [12] documented the writs as a form of judicial review of administrative acts, exploring the development of habeas corpus, mandamus, and certiorari as a mode of judicial review of administrative actions in the Indian constitutional jurisprudence. [13] examined the role of national green tribunal as an add on to the judicial review in the context of environmental protection. [14] has argued that Public Interest Litigation has turned the Indian Supreme Court into an institution which has had an effect to reach to marginalized communities who do not have a source of access to formal legal processes. [15] has elsewhere analyzed the future of judicial review in South African administrative law, which can provide a successful entree into the topic, through which the Indian developments may be evaluated. Indian constitutional debate has also been informed by the concept of judicial minimalism that is discussed by [16].

Judicial accountability and independence as conditions under which effective judicial review could be achieved has been explored by other scholars including [17], who argue that judicial accountability and judicial independence should be weighed against each other. [18] looked at the questions of judicial appointments and judicial independence in India, but as a democratic issue of accountability, he observed that there are both advantages and disadvantages of the collegium system. [19] has also given a transatlantic comparative analysis of the judicial review in France and United States providing insights which may be applied to the hybrid model in India. The classic discussions of the Constituent Assembly recorded by [7] are still invaluable when it comes to the original intent of the judicial review provisions of the Indian Constitution.

3. METHODOLOGY

This paper will utilize a doctrinal approach to legal research which is the traditional and most adequate approach to the constitutional and legal scholarship [20]. Doctrinal research is the systematic study of primary and secondary legal sources to gain an understanding of the principles, rules and doctrines that govern a particular field of law. The study is based on the three main types of sources since each has its own dimension to the overall research.

3.1 Primary Legal Sources

Some of the primary sources of law that have been examined include: (i) the Constitution of India, specifically Article 13, Article 32, Article 131137, Article 226, Article 246, Article 368, Article 371372, and Article 373374, and the Seventh Schedule; (ii) landmark judgements of the Supreme Court of India such as Kesavananda Bharati v. State of Kerala (1973), Maneka Gandhi v. Union of India (1978), Minerva Mills Ltd. v. Union of India (1980), Vishaka v. State of Rajasthan (1997), Om Kumar v. Union of India (2001), and P. Ramachandra Rao v. State of Karnataka (2002); and (iii) relevant legislative texts such as the Government of India Act, 1935. The landmark cases, which are discussed in this study, represent more than 70 years of constitutional jurisprudence, and thus provide evidence of the smooth evolution of the Basic Structure Doctrine since its beginning with Golaknath case to the present Table 2.

Table 2. Landmark Supreme Court Cases in the Evolution of Judicial Review (1950–2002)

Case Name	Year	Key Ruling	Impact on Judicial Review
A.K. Gopalan v. State of Madras	1950	Narrow reading of Article 21	Limited scope of personal liberty
Golaknath v. State of Punjab	1967	Parliament cannot amend Fundamental Rights	Expanded protective scope
Kesavananda Bharati v. State of Kerala	1973	Basic Structure cannot be amended	Supreme limitation on Parliament
Maneka Gandhi v. Union of India	1978	Articles 14, 19 & 21 inter-related	Substantive due process adopted
Minerva Mills v. Union of India	1980	Harmony between Parts III & IV	Reinforced basic structure
Vishaka v. State of Rajasthan	1997	Guidelines for workplace safety	Judicial law-making upheld
P. Ramachandra Rao v. Karnataka	2002	Judicial legislation checked	Limits on judicial law-making

3.2 Secondary Sources and Comparative Analysis

Peer-reviewed journal articles, academic monographs, constitutional commentaries, and comparative constitutional law literature are all examples of peer-reviewed articles [21]. This research uses examples of Indian, U.S., U.K., South African and German scholarship to position Indian judicial review in a world constitutional framework. The comparative analytical approach measures the Basic Structure Doctrine in relation to constitutional practices observed in other federal democracies to help identify the uniqueness of the Indian model of judicial review as well as to identify limitations of that approach.

Figure 2 shows the chronological development of the Basic Structure Doctrine of 1950 to 2007, tracking down the events in the Constitution, which were the major milestones in the development of the doctrine. The history establishes a continuum of the mounting strain between parliamentary supremacy and constitutional entrenchment which would eventually solve itself through judicial action in landmark cases such as Kesavananda Bharati (1973) and Minerva Mills (1980).

3.3 Analytical Framework

The analysis follows the four thematic issues: (i) constitutional underpinnings of judicial review; (ii) the scope and development of the Basic Structure Doctrine; (iii) relationship between judicial activism and separation of powers; and (iv) the limits of judicial law-making and proper boundaries of judicial overreach [22]. The analysis of the case law is organized chronologically and thematically and can be followed back to the early post-independence period up to the present day constitutional adjudication. This research approach enables a rigorous and systematic study of the research questions with the interdisciplinary breadth of research required of constitutional scholarship.

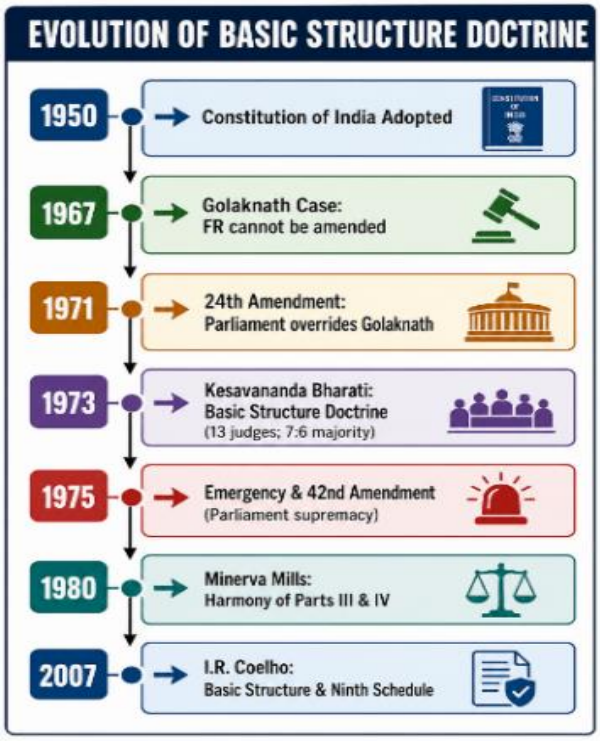


Figure 2. Chronological Evolution of the Basic Structure Doctrine in India (1950–2007)

4. RESULTS AND DISCUSSION

4.1 Constitutional Foundations of Judicial Review

Articles 13, 32, 131 136, 137, 226, 246, 368(4), and the Schedule three of the Indian Constitution come out clearly to support the legal right to reviewing of the legislation. A rule passed by the state legislature or by Parliament can be overruled by the courts, either as outside the range of its legislative competence under Articles 245, 246 and 248; or as infringing the rights of any of the basic rights guaranteed by Part III of Article 13; or as violating the constitutional clause such as Article 254 that impose restrictions on legislatures [7].

A right is empty, without a cure. Had the Constitution not introduced a sure means of ensuring the Fundamental Rights it guaranteed, such rights would have been worthless. Under Articles 32 and 226, the right to appeal the Supreme Court and the High Courts, respectively, to enforce the Fundamental Rights of the Constitution. In his article, Draft Article 25 (now Article 32 of the Constitution), Dr. Ambedkar noticed on December 9, 1948 that it was the very soul of the Constitution and the very heart of the Constitution [7]. The underlying issue with judicial review, in a modern democratic society, is that judicial activism seems to conflict head on with the effective realization of social welfare objectives, by the legislature, in such a society [6]. The Government of India Act, 1935 had restricted the jurisdiction of the court to examine into the powers of interpretation covering issues that arose with the division of the powers between the Centre and the State units, since the constitution did not give a written Bill of Rights. The intention behind the new Constitution of India was to establish a more direct base on which judicial review could be based, and this was a fundamental point upon which all members of the Constituent Assembly could agree.

This right to constitutional remedies is in itself a fundamental right which is enforced by writs derived out of common law: habeas corpus (to order the release of a person unlawfully detained), mandamus (to order an official in a position of authority to perform its duties), quo warranto (to order a person to vacate an unlawfully assumed position), prohibition (to prevent a lower court continuing with its proceedings), and certiorari (to quash actions of an inferior court proceeding with its work). But with the introduction of Public Interest Litigation (PIL) and the watering down of the concept of locus standi in recent decades, Article 32 has been creatively understood to draw new sources of innovative remedies,

such as a continuing mandamus to obtain compliance on the part of executive agency with the directives of the judiciary.

4.2 The Basic Structure Doctrine Origin and Development

The most important step in judicial review in India is the Basic Structure Doctrine, as enshrined by the Supreme Court in the case, Kesavananda Bharati v. State of Kerala (1973). The doctrine holds that some fundamental features of the Constitution, such as the supremacy of the Constitution, the republican and democratic form of government, secularism, separation of powers, the independence of the judiciary, are the basic structure and cannot be abrogated even by a constitutional amendment [3].

The doctrine was based upon a historical constitutional dispute between the amending power of the Parliament in Art 368 and the judicial power to safeguard Fundamental Rights. Before Kesavananda Bharati, in Golaknath v. State of Punjab (1967) the Supreme Court had held that Fundamental Rights could not be amended by the Parliament. The 24th Constitutional Amendment in 1971 was an attempt to persuade over this ruling. Golaknath was struck down but the Kesavananda Bharati judgment went even further, recognizing the concept of basic structure as the implied restriction on the constituent power of Parliament [8].

Application and elaboration It was applied and elaborated in minimum 368(4) and 368(5) introduced by the 42mad Amendment which was held by the Supreme Court to be destroyed on the ground that it destroyed the essential feature of judicial review which in turn is a part of the basic structure. The court believed that a limited amending power, in itself, is a fundamental aspect of the Constitution, as it is the place to which the Constitution attributes its superiority [9]. This has since been implemented in I.R. Coelho v. State of Tamil Nadu (2007) which stated that even laws contained in the Ninth Schedule were not overruled by the basic structure.

4.3 Comparative Analysis of Judicial Review Systems

Comparative analysis of judicial review in major constitutional democracies as shown in Table 3 reveals that although all systems have common goal, constitutional supremacy, they vary greatly in terms of institutional design, scope and mechanisms. The Indian model is unusual in incorporating both abstract and concrete review, a separate Basic Structure Doctrine and a broad jurisdiction of PIL in India which does not have a specific counterpart in other constitutional regimes.

Table 3. Comparative Analysis of Judicial Review Systems Across Major Constitutional Democracies

Country	Type of Review	Constitutional Basis	Notable Feature
India	Abstract & Concrete	Articles 13, 32, 226, 368	Basic Structure Doctrine, PIL
USA	Concrete (Incidental)	Article III; Marbury v. Madison	Decentralized review, no explicit text
Germany	Abstract & Concrete	Basic Law, Article 93	Dedicated Constitutional Court
UK	Statutory Interpretation	Human Rights Act 1998	Parliamentary sovereignty preserved
South Africa	Centralised	Constitution, Sec. 172	Strong rights-based review post-apartheid
France	A Priori Review	Constitution, Article 61	Conseil Constitutionnel, pre-enactment

The United States has pioneered the concept of judicial review with Marbury v. Madison (1803) ruling, but the power of judicial review is decentralized, concrete, and incidental, not institutionalized with a specific constitutional court. Germany had a specified Federal Constitutional Court under the 93rd article of the basic law, which exercises an abstract and concrete review and whose influence was particularly effective on the Indian constitutional thought in regard to the proportionality doctrine [5]. A limited

concept of rights-based review was only adopted by the United Kingdom, with its long tradition of parliamentary sovereignty, with the Human Rights Act of 1998, which permits courts, however, to issue a declaration of incompatibility, but not to strike down legislation. Another unique model of constitutional regulation of legislative power [19] is the French model of a priori review by the Conseil Constitutionnel which reviews legislation before it can be enacted into law rather than ex post.

Post-apartheid South Africa Constitutional Court of 1996 was established as a centralised Constitutional court with extensive powers of constitutional review under Section 172, expressly authorising the court to strike down any acts of conduct or law inconsistent to the Constitution [15]. The model of India shares some aspects with the South African model - at least the focus on socio-economic rights and the transformative role of judicial review - though the common law tradition of the South African legal system, of inheritance of English legal institutions, remains intact.

4.4 Judicial Activism, PIL, and the Expansion of Rights

The United States was the first nation to conceptualize the aspect of judicial review, with the landmark decision of Marbury v. Madison (1803) establishing the power of judicial review in the USA, but the ability to review is decentralized, concrete, and incidental as compared to an institutionalized approach through a dedicated constitutional court. Article 93 of the Basic Law gave germany a dedicated Federal Constitutional Court who exercise both an abstract and concrete review and which have had a particularly jusdictive influence on the Indian constitutional thought on proportionality doctrine [5]. Countries with a tradition of parliamentary sovereignty, such as the United Kingdom, have struggled to get beyond the limited form of rights-based review called British constitutional review, which permits, but does not compel, courts to issue a statement of rights-based incompatibility known as British constitutional review. The model of a priori review by the Conseil Constitutionnel prior to enactment and not after, in a model France adopts, is another unique approach to constitutional control over legislative power [19].

Section 172 of the Constitution explicitly gave the Constitutional Court the power to strike down any actions or laws that are incompatible with the Constitution [15]. The model of India does have some commonality with the South African model - especially in its focus on the socio-economic rights and the transformative role of judicial review - but still retains the common law tradition of the inheritance of English legal institutions.

4.5 Limits of Judicial Law-Making and Overreach

The per se law-making of the judiciary, in itself, can be said to be violative of the rule of separation of powers, and the judiciary cannot go off in the role of a duly elected legislature which is the very democratic basis of the structure of the Constitution and legal order [16]. To track the main cases on both sides of the constitutional line formed by the separation of issues doctrine, Figure 3 illustrates the point of balance between the legitimate judicial activism and the illegitimate judicial activism.

The first means by which judicial legislation was clearly restrained was by a decision of seven judicial officers in the case of P. Ramachandra Rao v. State of Karnataka stating that the issue of giving directions of a legislative nature is not a properly within its jurisdiction and thus should not be locally rendered. The seven judge bench felt that the directions, as in the previous rulings, were invalid since the directions, even though directed to the defendant, were of a legislative nature, which could not be given by other than the legislature. In the Common Cause v. Union of India (2008) case, the Supreme Court did not issue any guidelines that would regulate road traffic because laying down guidelines is the role of the legislature [13].

The Court in Common Cause also provided rather a subtle decision: not all judicial activism is permissible and should therefore be acceptable. This judicial activism was valid when the judicial system gave a broader interpretation of the Articles 14 and 21 in the case of Maneka Gandhi v. Union of India. But when judges by judicial decisions declare a new principle of law of the nature specially reserved to the legislature, they make law, not an announcement of the law - that would have the effect of an Imitus rea [10]. The Division Bench in University of Kerala v. Council of Principals of Colleges (2009) indicated a doubt as to whether the Court could convert itself into an interim Parliament.

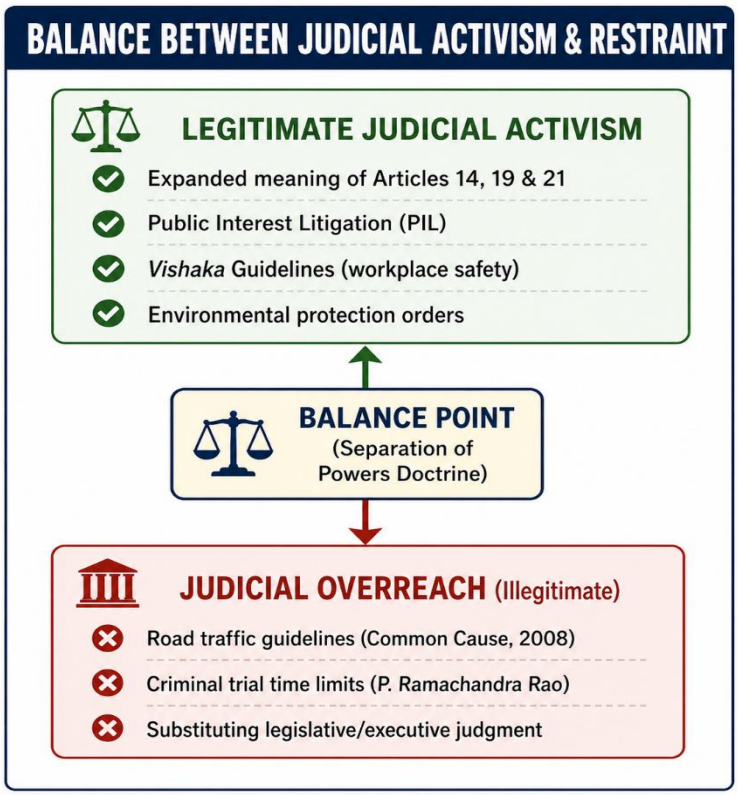


Figure 3. Balance between Legitimate Judicial Activism and Judicial Overreach in India

The key findings that emerge out of the analysis of judicial activism, in relation to the judicial overreach in light of the legislative role of the Indian Parliament are the following: (i) increased duty of the Supreme Court in instances where the government fails to enact suitable legislation or update on the existing legislation to reflect changes in social conditions; (ii) the Court has been viewed as the man-in-the-middle, and the PIL has made the steps of accessibility of justice to the poor a reality; (iii) the new PIL jurisprudence has made a significant contribution to the societal welfare; and (iv) in a society characterised by a high level of poverty and discrimination, a passive judiciary would be acclaimed as a traitor to its constitutional duty.

5. CONCLUSION

Judicial review is an essential element of the Indian constitutional system. Over the decades of constitutional adjudication, the Supreme Court of India has created an rich and subtle corpus of constitutional doctrine which has expanded the scope of judicial review far beyond the original textual foundations. The Basic Structure Doctrine is, perhaps the greatest contribution made by the Indian judiciary to the global constitutional law, and it places fundamental constitutional values beyond the reach of the parliamentary amendment and it also ensures that the Constitution is a living, supreme document. Until now, we have traced the progressive development of this doctrine, resting ourselves on the constitutional foundations whose rise and fall have been governed by the law of natural progression.

The development of judicial review in India represents a delicate and an ongoing negotiation between three consistent objectives in the constitution such as the protection of individual fundamental rights, the promotion of various socio-economic welfare goals outlined in the directive principles, and the preservation of the distance of powers between the legislature, executive, and judiciary. A comparative analysis in Table 3 shows that the model of judicial review in India is unique of all the constitutional democracies, not only in its breadth, but also in the accessibility to it brought by a PIL-based accessibility approach.

This study goes to imply that judicial review practiced with proper restraint and purposive constitutional interpretation is a critical measure of democratic accountability and safeguarding of constitutional rights. Nevertheless, the court has to push the envelope and stay mindful of its institutional functions within a democratic polity and avoid the temptation to step into its own socio-political preferences to those of elected representatives. As Figure 3 shows, the line between legitimate judicial activism and illegitimate judicial over-activism is defined by determining whether the court is in the process of interpreting and filling in gaps in the current law or whether it is effectively law-making anew in areas which are the prerogative of Parliament.

Future studies need to look at how PIL jurisprudence affects the quality of state governance, the implication of the Basic Structure Doctrine in relation to constitutional amendments in the context of contemporary governance issues, and a more systematic comparative-as-you-go analysis of constitutional courts in the Global South. Judicial review in India is in constant evolution thus it is highly fruitful to scholars and practitioners of the constitution around the world. The constitutional ideal of constitutional governance needs that each organ of the State should operate within the area to which it is assigned and which provides to which it is subjected strength in the confidence of the citizenry and in the legitimacy which comes with a principled commitment to the rule of law.

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Author Contributions Statement

Name of Author	C	M	So	Va	Fo	I	R	D	O	E	Vi	Su	P	Fu
Dr. Prasanth Kumar Ponugoti, ITS	✓	✓	✓	✓	✓	✓			✓	✓	✓	✓	✓	

C: **C**onceptualization
M: **M**ethodology
So: **So**ftware
Va: **Va**lidation
Fo: **Fo**rmal analysis
I: **I**nvestigation
R: **R**esources
D: **D**ata Curation
O: Writing- **O**riginal Draft
E: Writing- Review& **E**diting
Vi: **Vi**sualization
Su: **Su**pervision
P: **P**roject administration
Fu: **Fu**nding acquisition

Conflict of Interest Statement

The authors declare that there are no conflicts of interest regarding the publication of this paper.

Informed Consent

All participants were informed about the purpose of the study, and their voluntary consent was obtained prior to data collection.

Ethical Approval

The study was conducted in compliance with the ethical principles outlined in the Declaration of Helsinki and approved by the relevant institutional authorities.

Data Availability

The data that support the findings of this study are available from the corresponding author upon reasonable request.

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